

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 2 3 2015

## CERTIFIED MAIL 700103200004 6184 88333 RETURN RECEIPT REQUESTED

Mr. Mark Gomez Environmental Health & Safety Coordinator Roush 11916 Market Street Livonia, Michigan 48150

> Re: Notice of Violation Compliance Evaluation Inspection EPA ID No. MID094555299

Dear Mr. Gomez:

On August 29 and 31, 2012, a representative of the U.S. Environmental Protection Agency inspected the Roush facility located in Livonia, Michigan. At the time of the inspection, Roush was a large quantity generator of hazardous waste, and Roush is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Roush's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Roush, EPA's review of records pertaining to Roush, and the inspector's observations, EPA has determined that Roush has unlawfully stored hazardous waste without a license or interim status as a result of Roush's failure to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which Roush was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(0), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraph 1 is also independent TSD

requirements incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(0). Accordingly, each failure of Roush to comply with these conditions is also a violation of the corresponding requirement in in Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(0) [40 C.F.R. Part 265].

Finally, EPA has determined that Roush violated RCRA requirements related to hazardous waste determinations and recordkeeping, as described in paragraphs 1 - 2, below.

### STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Roush was out of compliance with the following large quantity generator license exemption conditions:

#### 1. Training Records

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. See Mich. Admin. Code. r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. See Mich. Admin. Code. r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;
- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Mich. Admin. Code. r. 299.9306(1)(d), 40 C.F.R. § 265.16(d) [40 C.F.R. § 262.34(a)(4) and 265.16(d)].

At the time of the inspection, Roush did not have and was unable to provide in response to a request records that document the employee training for calendar years 2011 and 2012.

**Summary:** By failing to comply with the conditions for a license exemption, above, Roush became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste operating license. Roush failed to apply for such a license. Roush's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o) is also an independent violation of the corresponding TSD requirement.

#### OTHER VIOLATIONS

Roush violated the following generator requirements:

2. <u>Hazardous Waste Determination and Land Disposal Restriction Applicable Treatment Standards.</u>

Under Mich. Admin. Code. r. 299.9302(1) [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. Under Mich. Admin. Code r. 299.9311(40 CFR § 268.9(b)), Where a prohibited waste is both listed under 40 CFR part 261, subpart D and exhibits a characteristic under 40 CFR part 261, subpart C, the treatment standard for the waste code listed in 40 CFR part 261, subpart D will operate in lieu of the standard for the waste code under 40 CFR part 261, subpart C, provided that the treatment standard for the listed waste includes a standard for the constituent that causes the waste to exhibit the characteristic. Otherwise, the waste must meet the treatment standards for all applicable listed and characteristic waste codes.

At the time of the inspection, Roush had determined that the waste paint related material generated during closure of its painting line was nonwastewater, D001 High TOC Ignitable Liquids, D035 (no subcategory, concentration-based treatment standard in 40 CFR § 268.40 plus meeting universal treatment standards), and F003/F005 (listed waste with concentration-based treatment standards for 28 regulated hazardous constituents in § 268.40). The Land Disposal Restriction Notification Form for manifest 004826869FLE lists five underlying hazardous constituents and, by use of "N" to complete its form, identifies none of them as "contaminants subject to treatment." All of the five underlying hazardous constituents are found in the treatment standards for listed solvents in 40 CFR

268.40, and 40 CFR 268.48 provides universal treatment standards for all five constituents. The information on the notification form conforms to the Notification requirement of 40 CFR 268.7 but provides incorrect information regarding applicability of the listed waste treatment standards.

#### 3. Used Oil Generator Off-site Shipment

Under Mich. Admin. Code. r. 299.9810(3) [40 C.F.R. § 279.24], "Off-site shipments," used oil generators must ensure that their used oil is transported only by transporters who have obtained EPA identification numbers except for self-transportation of small amounts to approved collection centers or to aggregation points owned by the generator. "Used oil generator" means any person, by site, whose act or process produces used oil to become subject to regulation. "On-site" means on the same or geographically contiguous property which may be divided by public or private right(s)-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along, the right(s)-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way which the person controls and to which the public does not have access, is also considered on-site property. Generators may transport, without an EPA ID number, used oil that is generated at the generator's site to an aggregation point provided that:

- (1) The generator transports the used oil in a vehicle owned by the generator or owned by an employee of the generator;
- (2) The generator transports no more than 55 gallons of used oil at any time;
- (3) The generator transports the used oil to an aggregation point that is owned and/or operated by the same generator.

At the time of the inspection, you described the transportation of used oil along Market Street to a site owned and/or operated by Roush. A used oil aggregation point is any site or facility that accepts, aggregates, and/or stores used oil collected only from other used oil generation sites owned or operated by the owner or operator of the aggregation point, from which used oil is transported to the aggregation point in shipments of no more than 55 gallons under the provisions of the § 279.24.

At this time, EPA is not requiring Roush to apply for a Michigan hazardous waste storage license because Roush had completed closure of its generator of hazardous waste manufacturing and accumulation area before the inspection.

Due to the nature of the violations and closure of the hazardous waste-generating painting line, it is not possible for you to return to compliance with respect to violations 1 and 2 above. The owner or operator of a used oil aggregation center described in violation 3 above is not required to notify EPA of its regulated waste activity. Therefore, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the

applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Roush's cooperation.

If you have any questions regarding this letter, please contact Ms. Sue Brauer, of my staff, at (312) 353-6134 or at brauer.sue@epa.gov.

Sincerely,

Gary 1. Victorine, Chief

RCRA Branch

Enclosure

cc: Tracy Kecskemeti, (KecskemetiT@michigan.gov)

John Craig (craigj@michigan.gov) Lonnie Lee (leel@michigan.gov)

	·				•
	·				
				÷	·
			+		
		*			
	•				
				·	•
					·
•					
					•

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5, LCD, RCRA Branch, LR-8J 77 W. JACKSON BLVD. CHICAGO, IL 60604

#### RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:

ROUSH ENTERPRISES INC

**EPA ID NUMBER:** 

MID094555299

**ADDRESS:** 

12068 MARKET ST

LIVONIA MI 48150

DATES OF INSPECTION:

August 29 and 31, 2012

**EPA INSPECTOR:** 

Sue Rodenbeck Brauer

**Environmental Scientist** 

PREPARED BY:

Sue Rodenbeck Brauer

Compliance Section 2

Date

ACCEPTED BY:

Warre.

Date

7/15/2013

Mirtha Capiro, Acting Chief

Compliance Section 2

			•
			•
,		V	
		• .	
•			
·			
		•	
•			
:			
			·
-			
		•	
			r .
	•		

Purpose of Inspection

This inspection was an evaluation of Roush Enterprises Inc.'s compliance with hazardous waste regulations found at Michigan Administrative Code Rules (MAC Rules), Parts 1 through 8 and the Code of Federal Regulations (CFR), Parts 260-279. I performed the inspection without an MDEQ inspector present. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as a large quantity generator (LQG).

#### **Participants**

*Inspector(s):* 

Sue Rodenbeck Brauer, Environmental Scientist, EPA

Site Representative(s):

Mark Gomez, Coordinator, Environmental Health & Safety Coordinator, Facilities

#### Introduction

On August 29, 2012, I arrived at 12068 Market Street in Livonia, Michigan at 9:45 a.m. I learned from the receptionist that Mr. Gomez' office is in Building 7, next door to the south. I introduced myself to Mr. Gomez, presented my enforcement officer credentials, and handed Mr. Gomez a business card. Mr. Gomez informed me that he had scheduled an inspection of a hydrogen tank with an MDEQ inspector in the afternoon, so I agreed to finish the inspection on August 31, 2012. This did not require a changing my travel plans.

According to RCRAInfo, the facility had not been inspected since 2006. Mr. Gomez started with Roush in July 2008. Mr. Gomez stated that there are over 4,000 Roush employees worldwide; there were nine employees on the paint line and 104 employees in the building. I provided a Small Business Resources information sheet anyway.

#### Site Description

The buildings are part of Roush's "Livonia Campus" (map in Appendix A). Mr. Gomez described the regulated activities generating hazardous waste in Building 28, painting injection-molded plastic parts, as having stopped in December 2011.

#### Site Tour

Mr. Gomez led the Building 28 site tour on August 31, 2012. I observed that injection molding continues at this facility. The paint line had been dismantled; see photographs P1010258 through P1010262 in Appendix A. Supplies for a re-lamping project were staged in the old paint line area.

I observed facility molding operations in Building 28, used oil storage, and emergency equipment. I took photographs of used oil totes and closure of the former paint line location in Building 28 during the site tour. The used oil totes were labeled. One RCRA-empty tote had a defective valve and leaked when in the upright position; a note to keep the tote upside-down could have prevented workers from turning it right-side up.

•	•						•
					٠	·	
						*	
			•				
	•				•		
						•	
•							4
				٠.			
			*				•
•							
		e e e e e e e e e e e e e e e e e e e					•
		•					
							•
				•			
						•	
•							·
					•		
• •							
			i				
		•					
•							
							-
	•						
			,				
•							
		•		· .		•	
		٠			٠	•	
	•						
				•			

#### Records Review

I provided Mr. Gomez with a list of documents I wished to review. On August 29, 2012, I reviewed five manifests with 2012 dates, three manifests with 2010 dates, and the associated land disposal restriction notifications. See photos P1010192 through P1010196 in Appendix A. I also reviewed Material Safety and Data Sheets for Mobil DTE hydraulic oil, Gage purge solvent, DuPont basecoat, DuPont primer, and DuPont clearcoat. The hydraulic oil MSDS stated that the unused product is not ignitable, corrosive, reactive, or toxic (by TCLP determination). I reviewed waste profiles/characterizations, waste analysis records (e.g., manufacturer analysis of ten T8 GE Ecolux Fluorescent Lamps), manifests, land disposal restriction (LDR) notifications (e.g., Clean Harbors' explanation of why underlying hazardous constituents are not identified for waste to be treated by CMBST), and the contingency plan. Fully regulated generator and universal waste generator inspection checklists are in Attachment C.

During review of records, the absence of employee training records, a home address for the Emergency Coordinator, an improper used oil tracking document, and the absence of underlying hazardous constituents in waste to be incinerated were noted. Mr. Gomez and I discussed whether a used oil tracking record would be treated as CBI, and he agreed that I could show this liquid industrial waste manifest to a Crystal Clean manager. This record was copied during the inspection, *see* Attachment D.

#### **Closing Conference**

We summarized the land disposal restriction and waste identification issues identified during the inspection. Mr. Gomez did not make any CBI claims. The inspection concluded at approximately 3:00 PM.

#### **Attachments**

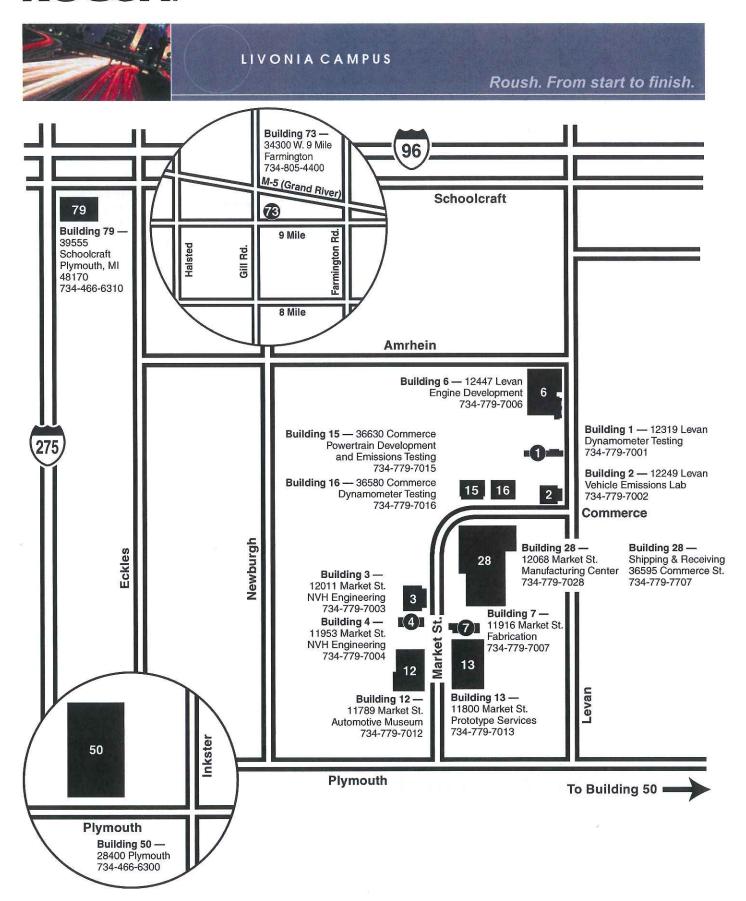
- A. Site Diagram for Building 28 at 12068 Market Street, Livonia
- B. Photographs and Photo Log
- C. Checklists
- D. Document(s) Copied

			•			
				* .		•
	·		4			
				,		
	·					
		•				
	•					
	•	A				
				. *		
	·					

# ATTACHMENT A Site Diagram



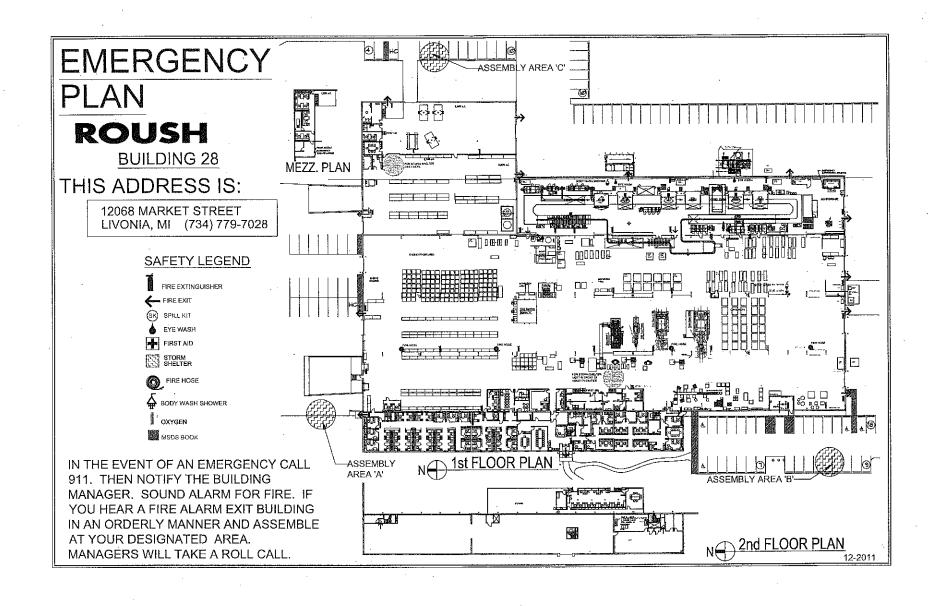
### **ROUSH**



Raptor

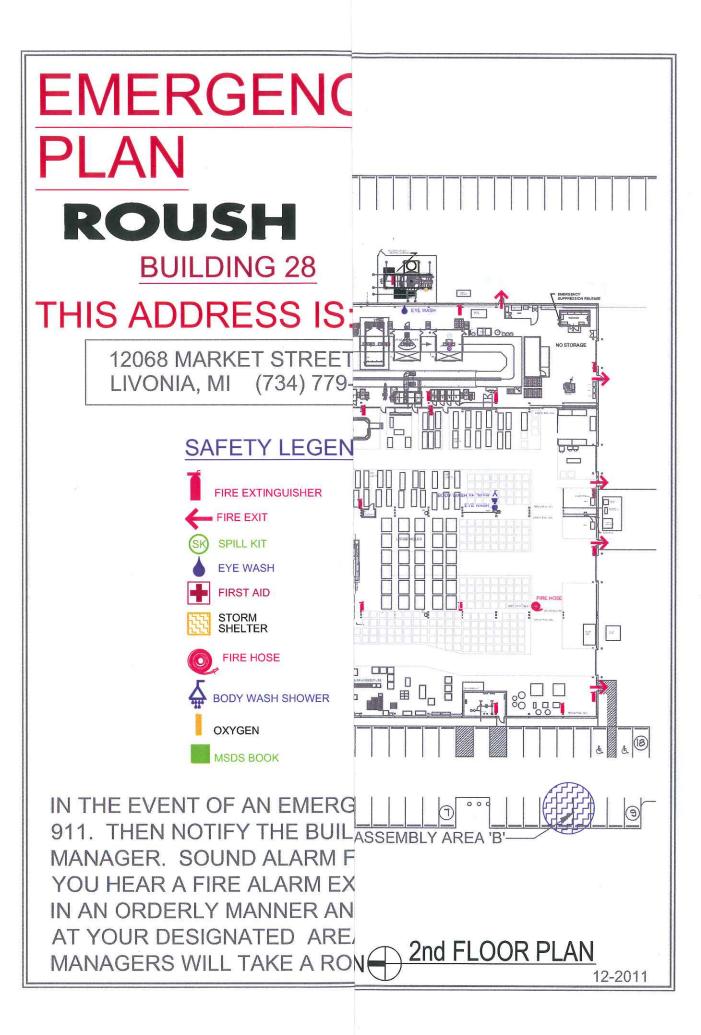
Roush Mustang Conversions

Aldg 7 no EPA 100



SRB rucined 8/20/12

tarmer starage





# ATTACHMENT B Photographs

		•		•		•
	``.					
						•
		• .				
•						
		-				
•						
					•	
					•	
•						
					•	
			."*			
				÷		
				* .		
				,		
					·	
	•				•	
		-				
					. 4	
	<u> </u>			4		
		•				
•	•					
	•					
	•					:
				•		
				•		
				•		
		•				
						•
					•	•
		÷				
				•		
÷			•			

**RCRA Inspection Photo-Log** 

Photographer: Sue Rodenbeck Brauer Location: Roush Enterprises Inc. Date(s): August 29 and 31, 2012

manhole cover.
P1010262 Freshly finished concrete.

Daic(s). A	ugust 27 and 31, 2012	
Photo #	Description	Date
P1010191	Street view of 12068 Market Street	8/29/12
P1010192	Manifest 004815316 FLE	8/31/12
P1010193	Land Disposal Restriction Notification for Manifest 004815316	8/31/12
	FLE	
P1010194	Manifest 005236545 FLE	8/31/12
P1010195	Manifest 005236545 FLE	8/31/12
P1010196	Land Disposal Restriction Notification for Manifest 005236545	8/31/12
	FLE	
P1010255	Tote labeled "Used Hydraulic Oil"	8/31/12
P1010256	Same tote of "Used Hydraulic Oil as in P1010197	8/31/12
P1010257	Additional tote of "Used Hydraulic Oil"	8/31/12
P1010258	Former paint line generated hazardous waste is this area. Re-	8/31/12
	lamping supplies are staged at the left foreground.	
P1010259	Concrete was poured in the former location of the sludge pit	8/31/12
	for a water wash (part of former paint line).	
P1010260	Freshly finished concrete.	8/31/12
P1010261	Mr. Gomez did not know the function of the space beneath the	8/31/12
	1	1

8/31/12

•	·					
						•
		•		•		
	•				•	
•		•				
				•		
			•			
•						
		•				
				•		
			•	•	-	
			-			
•						•
		,				
			* * *			
			* .		•	

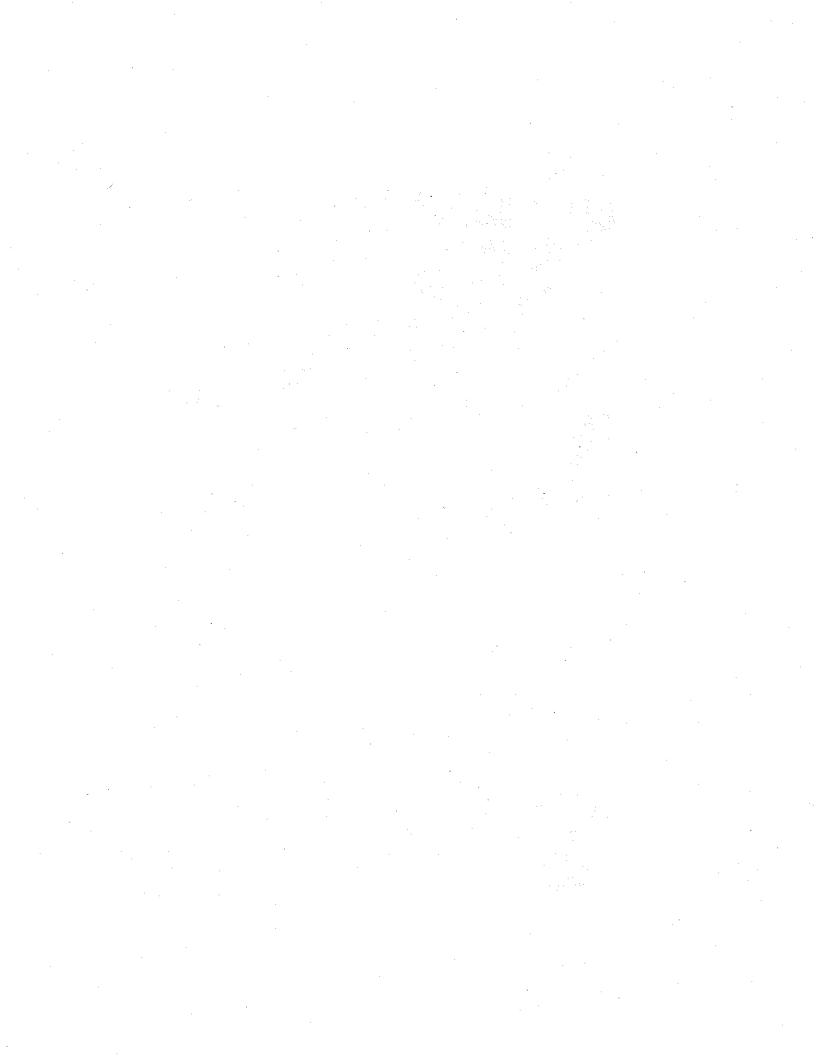


Photo P1010191. Street view of 12068 Market Street, Livonia, Michigan. 8/31/12.

·			·		
		7		٠.	
· .					
					·.
					·
	·				
		·	÷		
		·		٠	
					•
	2				
					+

	1 1 10.0	IFORM HAZARE WASTE MANIFES	ID Malaine and	mator to Number	S S 9	Dewiler)			SC PPW	3/3/20 Phone	S.S.	Form.	Approved (	OMB No. 76	50-time
1	0 2	oush Manuf 1916 Marks	acturing a Street					Géneral Géneral	O) 4 8 3 3 br s Sin Actress	74 H Material h	1.003	81	5316	F	E
	6. It	araporter I Compa	N Name	288 A	TIN Ma	erk Gorna	0.7	120 Live	68 Market nia,MI 48:	t Street					
	7. To	e an Harbor e an Harbor espaid Facility N	y Name Environ	mental Se	rvicesi	00					MAD U.S. EPAID N		1222	8.0	
	50	ring Grove F 79 Spring C	SOME S	Resovery	Inc	10					US EPAID	039:	3222	50	
	9s. HM	95 Phone 95 U.S. DOT De and Packing Gro	scription (included to (if any))	ing Proper Shipp	ning Name, H	Hazard Class,	ID Number,		10. Conta	billers	O H D	12.00	166	29	
	GENERATOR	UN1263.	NASTE PA	UNT RELA	NTED M	ATERIAL	. 3. PG II		110	Type	Quantity	WE/Vot		Waste Code	
- Carrie	- GENE	2.				Talk.	Serve.		15	DM	6750	P	F005		
		3	23	J				7				10 10			
			200		1		11-21	18 3	160	No. of					
	1					18531				The second second	The second second	1	A PERSONAL PROPERTY.		
-	15 G	arked and alocied.	EROR'S CERT	SSERGE.	128 sereby declar is in proper o	DOUGHDON TOU DO	ansport accords	nsignment are fully a	metional and na	escribed above	a by the proper shartel negulators	coping name	, and are cla	assified, paper state of the point of the po	aget,
1.1.1	15 G m El to General	H225257 ENERATOR'S OFF	EROR S CERT electrified, and a the contents of manufaction s and Types Nagre	SSERGE	128 sereby declar is in proper o int conform to lied in 40 CFR	condition for the to the terms of	ransport accords filter attached Er if I am a large qu	ng to applicable into PAAcknowledgment uantity generator) or Signature	mational and na of Consent. (b) (if I am a am  Port of se	nel quantity ge	mental regulatora eneration) a true.	owing harris. If export sit	e, and are clupment and l	issified back lambe Print	ary
RTER INT	15 G m Ei to General 16 International 17 Transport	ENERATOR'S OFF safed and aboled, popular, I carrily the sectify that the wash for supplemental than a making Shipment oner signature (for reporter Actinoviad year I Propagating	EROR'S DERTI Illacanded, and a the contents of e emanifications of the contents of exports only) general of Racep d Name	IFICATION: 1 have in all respect this consignment atternent identification of Materials.	128 sereby declar is in proper o int conform to lied in 40 CFR	condition for the to the terms of	ransport accords filter attached Er if I am a large qu	ng to applicable into PAAcknowledgment uantity generator) or Signature	mational and na of Consent (b) (if I am a sm	nel quantity ge	mental regulatora eneration) a true.	noping name i #export si	e, and are clubment and	I am the Prin	ary
TNI	15 G  General  16 Interpretation  17 Transpo	ENERATOR'S OFF arrived and labeled/ aponter, I certify the poster, I certify the colify that the weak that subjectors Protect institutes Shipment orise signature (for exporter Admonistic orier I Protect Type orize 2 Psinted Type	EROR'S CERT in a content of the contents of manimization ser Types Name contents of manimization ser Types Name content of Receip d Name	IFICATION: 1 have in all respect this consignment atternent identification of Materials.	128 sereby declar is in proper o int conform to lied in 40 CFR	condition for the to the terms of	ransport accords filter attached Er if I am a large qu	ng to applicable into PAAcknowledgment uantity generator) or Signature	mational and ha of Consent. (b) (fill am a sm  Port of sr  Date lease	nel quantity ge	mental regulatora eneration) a true.	roping name If export sh	e, and are classified and Mc	I am the Prin	ary
RTER INT	15 G m Et General Transport Transpor	ENERATOR'S OFF arrived and labeled; opporter, I certify that porter in I certify that certify that the wash that subjectors Protect and the wash that subjectors Protection of the I certified of the I cer	EROR'S CERTI- laboration, and in the contents of a minimization is Types Nagra- exports only): yound of Receip is Name All or I laborated in the contents of the contents only in the contents on the contents	IFICATION: 1 have in all respect this consignment atternent identification of Materials.	128 sereby declar is in proper o int conform to lied in 40 CFR	condition for the constraint of the constraint o	ransport accords filter attached Er if I am a large qu	ng to applicable into	mational and ha of Consent. (b) (fill am a sm  Port of sr  Date lease	nel quantity ge	mental regulatora eneration) a true.	I Fesport at	p. and are cluberned and little littl	I am the Prin	1/2
RTER INT	15 G m E E E E E E E E E E E E E E E E E E	ENERATOR'S OFF arrived and labeled popular, I carrily that out in the washing software from the second of the seco	EROR'S CERT slaterried, and a the contents of minimulations of Types Nagre- exports only; general of Receipt Name All James G. A. Space	IFICATION: 1 have in all respect this consignment atternent identification of Materials.	128 sereby declar is in proper o int conform to lied in 40 CFR	condition for the constraint of the constraint o	ransport according to the uttached Eff the uttached Eff of the utt	og to applicable inte PAAXHOW dogment uantity generator) or Signature sport from U.S	residential and na control of Consent (b) (if I am a sm b) (if I am a sm b	tronal government quantity get the first control government govern	erestori a true.	estion	e, and are club control and the Club Club Club Club Club Club Club Club	I sm the Print t	1/2
EACH ITY THE ANSPORTER INT.	15 G m Si Conness Si C	ENERATOR SIDES arked and aboled apporter a certify that the west for a copy for for a	EROR'S CERT slaterried, and a the contents of minimulations of Types Nagre- exports only; general of Receipt Name All James G. A. Space	IFICATION: 1 have in all respect this consignment atternent identification of Materials.	128 sereby declar is in proper o int conform to lied in 40 CFR	condition for the control of the terms of R 262,27(a) (i)	ransport according to the uttached Eff the uttached Eff of the utt	og to applicable inte PAAXHOW dogment uantity generator) or Signature sport from U.S	medicanal and the circle content. (b) (if I am a sm  Post of a Date lease  Residue	tronal government quantity get the first control government govern	Partis Re	estion	Mc M	I sm the Print t	1/2 5 1/2 5 1/2 1/2
EACH ITY THE ANSPORTER INT.	15 G m E E E E E E E E E E E E E E E E E E	ENERATOR'S OFF arrived and labeled apporter, it certify that the west of the west for professors. From the arrived and the second of the arrived arrived and the arrived arrived and the arrived arrived arrived arrived and the arrived arrived arriv	EROR S CERT laterated, and is the contents of minimization of minimization of Types Name or Space of Name of Recept Name of Na	IFFICATION: 1 h are in all respect this consignment dentiti limport to U.S. tof Materials  Cuantity	128 serectly declared is in proper or not conform to fixed in 40 CFF	CHI	araspot accords from the attacked fifth at tacked fifth at tac	og to applicable inte PAAXHOW dogment uantity generator) or Signature sport from U.S	motional and the office of the content of the conte	Itema government quantity get the first guaranty get the first guaranty gua	Partis Re	estion	Mc M	South Do	1/2 5 1/2 5 1/2 1/2
EACH ITY THE ANSPORTER INT.	IS On Side District Control of State Con	ENERATOR'S OFF arked and sheled poorler, I carrily that poorler, I carrily that config that fee wash and subjectors Proceedings of the wash and subjectors Proceedings of the poorler Actinosised prior 2 Printed Type crepancy indication termine Facility for Consider Actinosised politics of Actin	EROR'S CERTIFICATION of Management of Manage	IFFICATION: 1 h we in all respect this consignment againment dentiti Import to U.S. t of Materials  Outently  Method Cooks  2	128 sereby declar is in proper or in conform to like in 40 CSS	Confedence on the second of th	ine attached if it is a tracked in a tracked in a tracked in it is a saste treatment in a saste treatment in it is a saste treatment.	nt. Seposal, and rec.	motional and the office of Consent. (b) (If I am a similar to the office of the office	reli quantiny ge  fig. 10 c  rely quantiny ge  fig. 10 c  rely (set  ving U.S.:	Partis Re	estion	IR. U.S. I.S. I.S. I.S. I.S. I.S. I.S. I.S	an be Printing to the Printing of the Printing	1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2
COMMETER FACULTY TREANSPORTER INT.	15 General Section 17 Tempor 17 Tempor 18 Dec 20 Tempor 1	ENERATOR'S OFF arked and sheled poorler, I carrily that poorler, I carrily that config that fee wash and subjectors Proceedings of the wash and subjectors Proceedings of the poorler Actinosised prior 2 Printed Type crepancy indication termine Facility for Consider Actinosised politics of Actin	EROR'S CERT lateration, and a the contents of the contents of minimization of the contents of	FIGURE 1 have a respect this consumer to the state of Materials and Country an	treesty declar is in proper or in conform to indicate the conform to itself in 40 CFF	Confedence on the second of th	ine attached if it is a tracked in a tracked in a tracked in it is a saste treatment in a saste treatment in it is a saste treatment.	ng to applicable into	motional and the office of Consent. (b) (If I am a similar to the office of the office	reli quantiny ge  fig. 10 c  rely quantiny ge  fig. 10 c  rely (set  ving U.S.:	Paris R	Tayor st	Mc Market and Market a	South Do	1/2 1/2 5 1/2 5 1/2 1/2 1/2

Photo P1010192



Generator   Roush Manufacturing   Manifest Tracking in     Address:   12068 Market Street   D04815316FLE     Livenia MI   48150   Sales Order No.   D5402606	
LINE ITEM INFORMATION Line Item: Page No Profile No: Treatability Group: LDR Disposal Category 1 CH235257 NON-WASTEWATER 2 (This is subject to LDR	1
	************
EPA Waste Code EPA Waste SubCategory	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
D001 High TOC Ignitable Liquids D035F003F005 LDR Chemical Data	*****************
The state of the s	Contaminants Subject to Treatment
ETHYL BENZENE N Y ETHANOL N Y METHYL ETHYL KETONE N Y	N N N
TOLUENE N Y XYLENES (MIXED ISOMERS) N Y	N N
Certification	Applies to Manifest Line Items
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.	1.
Waste analysis data where available to attached Signature Age Asset Print Name Alex Messettin. Tale Date	£6
	******************

Photo P1010193

		·					
				•			·
			* .				
·			•				
	•				•		
						:	
6 							
	•						
-						•	
•					•		
					:		
							ŧ.
							٠.
•		·					
		·					
					÷	•	
					•		
					•		
			. *				
				4			
•							

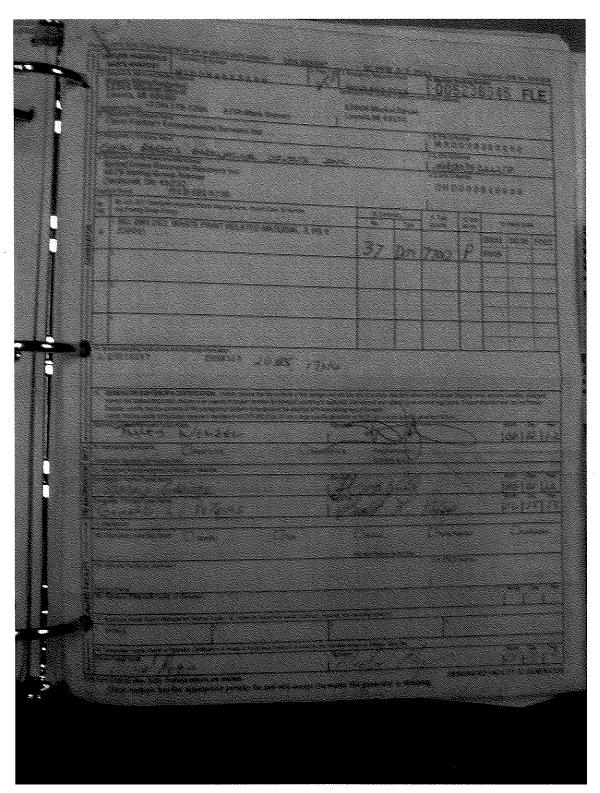


Photo P1010194

•						
				·		
		•	•			
				-		
			•			
•					•	
		•	•			
				· · · · · · · · · · · · · · · · · · ·		
			•			
						•
		•				
				•		
•					•	
· ·				-		
• •				4		
•						
			•			
•						
		*	. *			
	•					
			•			
			•			
			•			
	,		, .	•		-
· .			4			
	•					
		•				
		•				
	•					* .
				•		
•		•	•			
	·		•	•		
				·		
· ·		•		• .		
·	* 4					
•			*			
	•					
		and the second s				
	÷	•				

	1	5 German's Name and Ma FFEST Manufact Liverina, MI 491 Ceneralités Phone.	Uring Street	TTM AN	*	Generaliza 3.20	88 Marke	or different tha	005	METHOD STATE	Approved 0	FI	E E
	1	Generator's Phone.  E transporter il Company Na.  7. Transporter 2 Conceny Na.			BOOK TO SERVICE	Livo	nia,MI 48	150	US EPAIDN	urbe 039	3222	80	
1		ELEAS WAKES 8 Designated Facility Name a Springle Grove Re- 4979 Spring Grove Cinclinate OH 45	WHERE HEDDARLA	neumt Gre	LVILES .	DIC			US EPAID	O393 Jumber	2125	0	
		Facility's Phone: On. 9c. U.S. DOT Descript HM and Packing Group (f.)	(613) 881-573( ion (including Proper Shippi any))	ng Name, Hazard Class	ID Number,		IQ. Centai	- Contract of the Contract of	11. Total	12. Unit	8166		
	GENERATOR	x (D001)	. WASTE PAINT	RELATED MATE	ERIAL, 3, PG	"	37	Don	7700)	P	-	DO35	
	35	3							7,00				
		4.											
		Special Handling Instruction     Special Handling Instruction	s and Add tional Information	125 JOX									
	15	GENERATOR'S/OFFERDI											
100		CHANGE GROUND TRANSPORTED THE	and are in all respects	in Mode contiduo loci	transcort according to	applicable inter	national and na	escribed abovernation	re by the proper i	hipping ra is lifexport	roe, and are o	classified, pa dillam the Pr	ciaged mary
	1	Exporter, I penify that the or I cently that the waste minusererators to our Printed Type	ued, and are in all respects untents of this consignment mization statement identifie	in prope contains for the terms of a 40 CFR 262.27(a) (	transcort according to of the attached EPA A	applicable inter cknowledoment	national and na of Consent	Togal gavern	mental regulator	rispiny ra	shipment and	d I am the Pi	oraged many year 2   1/2
The state of the s	→ 12 16 Ti	Exports, I configuration of the configuration of th	and, and are in all respects on solers of this consignmen mization statement identified the Mamo  import to U.S. to only): of Receipt of Mataras	in prope contains for the terms of a 40 CFR 262.27(a) (	transport according to of the attached EPA A (if I am a large quanti	applicable inter cknowledgment ty generator) or	rational and na nt Consent. (b) (if i am a sm	Togal gavern	mental regulator	disposita	shipment and	dian the Pri	mary
	ANSPORTER INT'L *	Carolia, I carily has the a config. Year the waste min- erance of the waste min- erance of the waste min- terance of the waste min- terance of the waste of the suppor- tion of the waste of the suppor- tion of the waste of the suppor- ter supporter of the suppor	and, and offer in all respects of the property	in stope constant for I Configure I the terms of an 40 CFR 262.27(s), (	transport according to of the attached EPA A (if I am a large quant)	approache interchnowledgment by generator) or Signe to all from U.S.	rational and na nt Consent. (b) (if i am a sm	rail quantity g	mental regulator	Pipping rais is leeport	shipment and	down the Property of the Prope	sy Year 2   / 2
	TRANSPORTER INTL	Exports, Jesuity that he carry the control that he waste mine entailers claimers Printed Types, international Shipments in apparer signature (for export mesources Accomplishments New York Characterists Accomplishments New York New York (1994) New York (1	and principles of the state of	in proper considers for the learning of the le	transport according to of the attached EPA A (if I am a large quant)	appicable and control and cont	Port of e Dato so	rough government and quartity of the control of the	mental regulator	s f export	shipment and	Month D	9 Year 2 1/2
	ACILITY TRANSPORTER INT. 4	Transaction of the Control of the Co	and principles of the accession and markets of the accession and markets of the accession and markets of the accession and the accession accession and the accession accession and the accession accession accession and the accession accessi	in proper considers for the learning of the le	transport apporting to	appicable and control and cont	Port of e	rough government and quartity of the control of the	Mental regulator	s f export	shipment and	Month E Month	9) Veri 2   12   12   12   13   14   15   17   17
The second secon	NATED FACILITY TRANSPORTER INT'L +	Control of Control of the Control of Control	and, and are mail responses on the main section of maintenance of the sconsignment and market of the sconsignment and the sconsignment and the sconsignment are the sconsignment and the sconsignment are	in Brope consider for the service of an 40 CFR 282.27(g) (	ransport apporting to	application after the control of the	Port of a District Residue	ca Number	Pertia i	s f export	shipment and	Month E Month	ay Year  2   7 2  ay Year  2   7 2  ay Year  3   7 2
	SAVATED FACILITY TRANSPORTER INTL +	Transcription of Alemante Facility (or General Alemante Facility (or General Alemante Facility) (or General Alemante Facilit	and provide that response to the school of the control of the cont	in proper condition for the terms of an 40 CFR 282.27(g) (	Type	application and control application and control application and the control of Signature Signatu	Port of e Date to Date to Pert of e Date to Date to Pert of e Date to	integration of the state of the	Pertia i	s f export	shipment and	11 an the Price of the American Company of the America	9) Year 22   /2 2   /2
The state of the s	SNATED FACILITY TRANSPORTER INTLANS	According to a state of the control	and an art of all registers of the control of the c	in engine conduct of the terms of an 40 CFR 282.27(g) (	of maste treatment, it is a standard by the attached ERA. (If I am a large cuants of I type I	application affects application and the second application of the seco	Port of e Date to Date	and quartery of the state of th	Parlia I	is if export	stipped and	11 and the Price of the American Company of the Americ	9) Year 22   /2 2   /2

Photo P1010195

•		•			•			
						•		
				,				
ATT		•						
· · · · · · · · · · · · · · · · · · ·			*		**			
		•						
				:				
						-		
		·					•	
							•	·
		•						
							•	
						•	•	
•								
÷	•							
			÷					
					•			•
							•	÷
						·		
	•							
				•		:		
			•					
			•					
	•							
			·		•			
					•			
•								
							÷	
					•			

anHarbors ONMENTAL SERVICES FEST INFORMATION Generator: Roush Manual	**********	Land Disposal Re Notification F	estriction	Printed C	Page : 1 of 1
Address: 12068 Marke Livonia,MI 44 EPA ID#: MID 0 9 4 5	t Street 8150			Manifest Tracking 005236545FLE	Info.
DIE ITEM INFORMATION Une Item: Page No:	Profile No: CH235257	Treatability Grou	p: ] L	Order No. D543856 DR Disposal Catego (This is subject to U	ry
EPA Waste Code D001 D035F003F005	L		EPA Wast	e SubCategory nitable Liquids	
Chemical ETHYL BENZENE		LDR Chemical I	Data Underlying Hazardous Constituents N	Constituents of Concern	Contaminants Subject to Treatment N
METHYL ETHYL KETONE TOLUENE XYLENES (MIXED ISOMERS)			N N N	Y Y Y	N N N
Pursuant to 40 CFR 268.7(a), 1 he		ertification this shipment conta	ins waste resti	icted under 40 CFR	Applies to Menifest Line Items
Waste analysis data, where avail	able, is attache	d. Print N	ame	anec Wenz	
Title:					
0					

Photo 7101019,6

•				
		. ·		
		• •		
	44			
	•		•	
		·		
	÷			
		·		
		•		
•				
			· ·	
			•	
	•	•		
			•	
		•		





Photos P1010256 & P1010255

•	•				
		•			
•					
		· ·		•	
		•	•		•
•					
				ar .	
	•				
	<u> </u>				
	•				
					-
	•				
	·				
			+4		•
· ·				•	•
•					
					·
			•		
·					
	•				
					*
				•	
	·		e.		
		•			
		•			
		•			
		•			
		•			
		•			
		•			
		•			
		•			
		•			



Photo P1010257



			•			
			•		·	
				•		
		• .				
					-	
					•	
				1.44		
,						
						•
	*				•	
					the second	
		•				
	·					•
				:		
		1 1 1 1 1 1 1 1 1 1 1 1 1 1			:	
		· N				
	٠.					
					•	
	•	-				
·						
					•	
			•		•	
				•	•	
		•				
			•	•		
			•			



**Photos P1010259** 

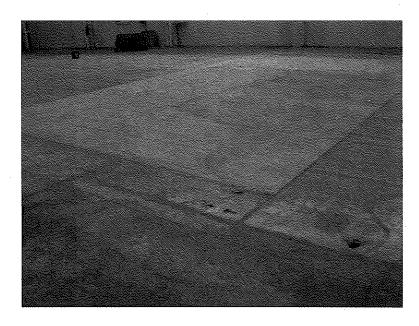


Photo PP1010260

	+ .			•		
					•	
				•		
•	·				•	
			•	•		
	•					
	-					
	•			* * * *		
			÷			
•						
					•	
		•			· ·	
•						
	•					
			•			
						•
*1						
			•			
		•				
	,					
	•					
	,					
		-				
		-				



P1010261



P1010262

					•		
	·	•			•		
	•						
						٠.	
				e.		,	
		*					
							•
					•		
				,			
		•					
			,				
					•		
				•			
			. •				
			e - 1	v			i
·							
							-
	·					·	
					•		

# ATTACHMENT C Checklists

			·	
		·		
		1		
•				
÷				
		e e		

# Department of Natural Resources & Environment HAZARDOUS WASTE INSPECTION

INSPECTION DATE 8/29/20	12_GEN	. I.D.#/	41D	09455	299 5 WE	OS ID#		
SITE SPECIFIC NAME ROUSE	+ EN	ITER	PRIS	SES	INC	2.		a =
SITE LOCATION ADDRESS 12	-068	MAK	RKET	ST			:: 	
CITY LIVONIA		ZIF	: 48	150	cc	DUNTY_	WAYN	JE
Reason for Inspection:	FCI	FUI	CSE	CAC	COMP	LAINT_	NRR	_OTHER
WASTE CODE		1	PROCESS	WASTE IS	GENER	ATED FR	OM	
					-			
					-431-0-1			
	II wi		. 5		14 8			
			ñ.	Market in State Control	and the second s		The Bulk was a second	
PERSON(S) INTERVIEWED	)		-11	ILE :		TEL	EPHONE N	UMBER
			26.					
		* 1		5				
			- CO	2				
						ANAMARA, NGA SANGAN		
INSPECTOR'S NAME			The application of the second	ENCY		TEL	EPHONE N	UMBER
		1000		PT OF NATU & ENVIRONM		2		
Sue Brauer		и	,s.E	PA		312-3	153-613	34
			Y.	*				4 %
PRIMARY BUSINESS OF FACILITY	aw	toin	dust	iy co	sul	ting		2 1 2 2
	8			U <sub>i</sub>		0		0
APPROX./AVG. # OF EMPLOYEES Rough campus is bigger the FACILITY SIZE	70 h nan EP	A ID #	facility OTOS TAK	AYS/HRS EN	OPERAT	ION NO		
CHRONOLOGY OF INSPECTION 8								**)
1) bldg. 28 conf. 100	m 4)_		. 1		7)			
2)	5)				(8)	, ,	1	- Company
3)	6)				9)			

SUMMARY OF FINDINGS	: (add sketch of si	te noting Haz W	aste locations	OR co	py of site plan provi	ded by site attached
	• •					
	-					-

CHECK						
FORMS	GENERAL CATEGORIES OF FACILITIES					
	CESQG					
	LIW GENERATOR					
	SMALL QUANTITY GENERATOR					
	SMALL QUANTITY GEN TANK SYSTEM					
	GENERATOR					
	GENERATOR TANK SYSTEM					
	SMALL QTY UNIVERSAL WASTE HANDLER					
	LARGE QTY UNIVERSAL WASTE HANDLER					
	USED OIL ACTIVITIES					
	TRANSPORTER LIW HAZ WST					
	WOOD PRESERVER					

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated waste? \_\_\_\_\_no \_\_\_\_\_ yes (If yes, send copy of this cover sheet to SWQD).

Does Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of operation(s): DISTILLATION FRACTIONATION THIN-FILM EVAPORATION SOLVENT EXTRACTION AIR OR STREAM STRIPPING (If yes, send a copy of this cover sheet to AQD).

CHECK	
FORMS	
USED	
	SITE SPECIFIC PERMITTED TSDF
	PERMITTED GENERAL TSDF
<u>.</u>	INTERIM GENERAL TSDF
	GENERATOR APPENDIX
	TANK SYSTEM
	PERMITTED SURFACE IMPOUNDMENT
	PERMITTED WASTE PILE
	PERMITTED LAND TREATMENT
,	PERMITTED LANDFILL
	MISCELLANEOUS UNITS
	PERMITTED ORGANIC AIR EMISSIONS- PROCESS VENTS
	PERMITTED ORGANIC AIR EMISSIONS- EQUIPMENT LEAKS
	INTERIM GW MONITORING (USE WITH SUBPARTS K,L, M, & N)
	INTERIM SURFACE IMPOUNDMENT
	INTERIM WASTE PILE
	INTERIM LAND TREATMENT
	INTERIM LANDFILL
	INTERIM CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT
	INTERIM ORGANIC AIR EMISSIONS FROM PROCESS VENTS
	INTERIM ORGANIC AIR EMISSIONS FROM EQUIPMENT LEAKS

INSPECTOR'S SIGNATURE	DATE	

# Department of Natural Resources & Environment FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name Roush Enter	prises		Part 3	Rules
Date 8/29/2012 ID#_	MID 094 555 299	6:	1994 P	A 451
HAZARDOUS WASTE AND WASTE#	SOURCE	Н	OW MUCH	
D002	corrosive bath for painting prep			
DOO! DO35 FOO3 FOO5	paint related waste			
			A) L	
				ų r
abbreviated FACILIT	Y COMPLIANCE REQUIRED IN ALL AREAS			
	DETERMINATION (Rule 302: 40 CFR 262.11		YES NO	
NI = Not inspected; N/A = Not applicable)  I. Determined if waste streams are hazardous waste	? (Rule 302: 40 CFR 262.11))	262A	[/i_	NI N/A
a) copy of waste evaluation on-site 3 years? (Rul		262D	1/1_	NI N/A
b) re-evaluated waste when changes in materials		262A	<u> </u>	NI N/A
	reating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	<u></u>	NI WA
3. Has the generator obtained an identification numb	er? (Rule 303: 40 CFR 262.12)	262A	<u>M</u> _	NI N/A
MANIFEST	FREQUIREMENTS (Rule 304: 40 CFR 262.20)		,	
. Copies of the manifest readily available for review		FSS	W1_	NI N/A
<ul><li>Manifests kept for the past 3 years? (Rule 307(3):</li></ul>	40 CFR 262.20(a))	262D	<b>☑</b>	NI N/A
6. Manifests, prepared by the generator according to	instructions in appendix of Part 262 contain the following:		,	
a) manifest document number (Rule 304(1)(b): 4	0 CFR 262.20(a)(i)),	262B	<u> </u>	NI N/A
b) generator's name, address, phone & ID # (Rul	e 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<u>[</u>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b	): 40 CFR 262.20(a)(i)),	262B	<u></u>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b	o): 40 CFR 262.20(a)(i)),	262B	<u> </u>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b):	40 CFR 262.20(a)(i)),	262B	<u></u>	NI N/A
f) quantity of waste, type & # of containers. (Rule	304(1)(b): 40 CFR 262.20(a)(i)),	262B	M	NI N/A
g) hazardous waste number of the wastes. (Rule		262B	<u>Ľ</u>	NI N/A
	of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<u></u>	NI N/A
	an 10 days after month shipment was made? (Rule 304(2)(b))	262B	<u>LJ</u>	NI N/A
requested by Director? (Rule 304(2)(c))	ignated facility, generator submitted copy of 3 <sup>rd</sup> signature manifest as	262B	<u>Li_</u>	NIN/A
<ol><li>Is the transporter used properly registered &amp;/or pe</li></ol>	rmitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<u> </u>	NI N/A
NOTE: For shipments of hazardous waste solely by v	vater or rail shipments, within United States see Rule 304(4)(g or h).	ğ nırız		ijn
10. Using manifest that has expired? (Rule 304(1)(a)		262B	[\dag{4}]	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262	10 10 10			
a) number of manifests generator HASN'T recei			200	Ų.
AND THE OWNER HANDS AND	itted exception reports to RA & DEQ after 45 days:		,	1
	city/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B		NI N/A
stopped generating pair	nt line wastes			
	ume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	1/1	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7)) YES NO 14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1)) a) all listed waste 268A NI N/A b) all characteristic wastes? 268A NI N/A NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b)) 15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2)) 268A NI N/A OR 16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3)) 268A NI N/A OR 17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4)) 268A NI N/A 18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9)) 268A NI N/A 19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3) a) EPA hazardous waste #? 268A NI N/A if wastewater or non-wastewater as defined in 268.2(d&f)? 268A NI N/A subcategory of the waste (such as D003 reactive cyanide) if applicable? 268A NI N/A manifest number associated with the shipment? 268A NI N/A waste analysis data, where available? 268A NI N/A waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents) 268A NI N/A g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9) 268A NI N/A did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48) 268A NI N/A 20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3) if the notice is for shipments that meet the standards does the notice include the certification? 268A NI,N/A if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition? 268A NIN/A NOTE: An alternate treatment standard may be used after approval from the Administrator, (40 CFR 268.44) NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45." comment 21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6) 268A NI N/A 22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7)) 268A NI N/A 23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8) 268A NI N/A NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste. DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3) 24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR; 268,3(a)) 268A NI N/A TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40) 25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c)) 268A NIN/A

EQP 5163 (Rev. 3-2010) Page 2

NI N/A

NI N/A

262D

262D

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)

27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))

29. And westlic packages market of Richeld ger DOT 49 CFR172 concerning hazardous materials (required before shipping wastle of selecy/fixtue Osoft/(p)(c)-40 CFR 282.34(a))  30. On containers of 119 gallons or less, is there a warning, generator's name, address, sile identification number, managed and code per DOT 49 CFR172.3907 (Pauls 305(1)(c))-40 CFR 262.32(b))  31. If required (>1000 8°s), are placards available to the transporter? (Rule 305(1)(c))-40 CFR 262.34(a)  32. If hazardous wastle accumulated in containers (fino, skip to \$435)  a) containers have accumulated in containers (fino, skip to \$435)  a) containers have accumulated which is clearly visible? (Rule 306(1)(c)): 40 CFR 262.34(a)(2))  42. If hazardous wastle accumulated which is clearly visible? (Rule 306(1)(c)): 40 CFR 262.34(a)(2))  52. C	PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)		YES N	0	
shipping waste off- site/?(Rule 306(1)(b)(c)-40 CFR 262.3(a))  30. Conotinatines of 119 gallations of 119 gallations class, is there a warriing, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR 172 3047 (Rule 306(1)(d): 40 CFR 262.3(b))  326	1868	262C	co.said V		WA
manifest tracking number & waste code per DOT 49 CFR172.3947 (Rule 305(1)(c)-4 0 CFR 282.32(b)) 282C		262C	co.said_v		N/A
ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  22. If hazardous waste accumulation date which is clearly resible? Rule 306(1)(b): 40 CFR 262.34(a)(2))  23. containers have accumulation date which is clearly visible? Rule 306(1)(b): 40 CFR 262.34(a)(2))  25. container clearly marked with the hazardous waste number? (Rule 306(1)(b))  25. container clearly marked with the hazardous waste number? (Rule 306(1)(b))  25. container clearly marked with the hazardous waste number? (Rule 306(1)(b))  25. container clearly marked with the hazardous waste number? (Rule 306(1)(b))  25. container clearly marked with the hazardous waste number? (Rule 306(1)(b))  26. container clearly marked with the hazardous waste number? (Rule 306(1)(b))  26. container clearly marked with the hazardous waste number? (Rule 306(3): 40 CFR 262.34(b))  26. container clearly marked with the hazardous waste number? (Rule 306(3): 40 CFR 262.34(b))  26. container clearly marked with the fact and extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))  26. container a 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container a 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container a 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container a 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container a 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container a 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container a 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container and 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container and 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container and 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container and 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container and 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container and 200 miles (270 days max/)? (Rule 306(4) 40 CFR 262.34(b))  26. container and 200 mil		262C	co.said_		N/A
32. If hazardous waste accumulated in containers: (If no, Skp to #52)  a) containers have accumulated in containers: (If no, Skp to #52)  a) containers have accumulated in containers: (If no, Skp to #52)  a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(3))  b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))  c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))  CR  e) one of the following spply:  i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))  262C			<u></u> _	_ NI	NA
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2)) 262C	ACCUMULATION TIME (Rule 306: 40 CFR 262.34)	ready	ren	nov	Ted
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3)) 262C	32. If hazardous waste accumulated in containers: (If no, skip to #35)				- R
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b)) 262C NI d) has more than 90 days elapsed since date marked? (Rule 306(1) 262C NI NI Part (Rule 306(1) 262C NI NI Part (Rule 306(1) 262C NI	a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C		NI	NA
a) has more than 90 days elapsed since date marked? (Rule 306(1)    OR  e) one of the following apply:  i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))   262C    NI  ii) it is F066 waste recycled for metals recovery in compliance with Rule 306(7) (180 days maximum).  Rule 306(7):40 CFR 262.34(a)   262C    NI  iii) it is F060 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(b))   262C    NI  iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than it or itil above? (Rule 306(9-10):40 CFR 262.34(b))    The following Subpart 1, 265.170 to 265.177 requiroments are referred to by Rule 306(1)(a) and 40 CFR 262.34(g)(1).  7 are containers in good condition? (265.173)   262C    NI  NI  i) are containers compatible with waste in them (265.172)   262C    NI  ii) ii) iii) iii) iii) iii) iii) iii)	b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	<u></u>	NI	N/A
e) one of the following apply:  i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))   262C	c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	<u></u> _	NI	N/A
e) one of the following apply: i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b)) 262C [_] NI ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g)) 262C [_] NI iii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) which must be transported more than 200 miles (270 days max.)? (Rule 306(6):40 CFR 262.34(h)) 262C [_] NI iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(6)-10):40 CFR 262.34(g)) 27 282C [_] NI The following Subpart I, 265 170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1). g) are containers in good condition? (265.171) 282C [_] NI g) are containers stored closed? (265.173(a)) 282C [_] NI i) containers shandled/stored in a way which may rupture it or cause leaks? (265.173(b)) 282C [_] NI i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)) 282C [_] NI j) ignitable & reactive wastes stored 15 meters (50 leet) from property line or written approval obtained from local fire prevention code authority for least and defects? (265.174) 262C [_] NI i) did the generator document the inspections in 32(b)? (Rule 306(1)(a)(ii)) 7	d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C		וא [	N/A
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b)) 262C [ ] NI ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g)) 262C [ ] NI iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(6):40 CFR 262.34(g)) 262C [ ] NI iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(g)) 262C [ ] NI The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).  g) are containers in good condition? (265.171) 262C [ ] NI are containers stored closed? (265.173(a)) 262C [ ] NI or containers stored closed? (265.173(a)) 262C [ ] NI or containers shandled/stored in a way which may rupture it or cause leaks? (265.173(b)) 262C [ ] NI or containers shandled/stored in a way which may rupture it or cause leaks? (265.173(b)) 262C [ ] NI or containers shandled/stored in a way which may rupture it or cause leaks? (265.173(b)) 262C [ ] NI or containers in species weekly for leaks and defects? (265.174) 262C [ ] NI or containers in species weekly for leaks and defects? (265.174) 262C [ ] NI or containers in species weekly for leaks and defects? (265.174) 262C [ ] NI or containers in species weekly for leaks and defects? (265.174(a)) 262C [ ] NI or property in the inspection document maintained on -site 3 years? (Rule 306(1)(a)(ii) 262C [ ] NI or property in the inspection document maintained on -site 3 years? (Rule 306(1)(a)(ii) 262C [ ] NI or property in the inspection document maintained on -site 3 years? (Rule 306(1)(a)(ii) 262C [ ] NI or property in unwashed containers? (265.177(a)) 262C [ ] NI or property in unwashed containers? (265.177(a)) 262C [ ] NI or property in unwashed containers? (265.177(a)) 262C [ ] NI or property in unwashed containers? (265.177(a))	OR			- 5	0
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum).  Rule 306(7) 40 CFR 282.34(g))  iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8).40 CFR 262.34(h))  (Rule 306(9-10).40 CFR 262.34(ii))  The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).  The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).  1) are containers ompatible with waste in them (265.172)  (B) are containers stored closed? (265.173(a))  (C) ontainers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  (B) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code autionity for less than 15 meter? (265.176)  (B) are containers inspected weekly for leaks and defects? (265.174)  (C) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))  (D) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))  262C   Ni   Ni    13) incompatible wastes stored in separate containers? (265.177(a))  (C) hazardous waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))  (D) hazardous waste is being accumulated at the point of generation:  a) container(s) being accumulated at the point of generation:  a) container(s) under operator control & near the point of generation:  a) container(s) under operator control & near the point of generation:  a) container(s) in year waste with the hazardous waste number or chemical name? (Rule 306(2))  d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  d) are container(s) occopatible with waste in them? (265.171)  f) are container(s) occopatible with waste in them? (265.171)  g) container(s) occopatible with waste	e) one of the following apply:				
Rule 306(7):40 CFR 262.34(g))  iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h))  iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(10):40 CFR 262.34(i))  The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).  1) are containers in good condition? (265.171)  262C	i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	Ц_	_ NI	N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8).40 CFR 262.34(h)  iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(10).40 CFR 262.34(ii))  The following Subpart I, 266.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).  1) are containers in good condition? (265.173)  262.0		262C		_ NI	N/A
Rule 306(9-10):40 CFR 262.34(i))		262C	_ப_	_ NI	N/A
f) are containers in good condition? (265.171)  g) are containers compatible with waste in them (265.172)  h) are containers stored closed? (265.173(a))  i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  j) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  262C				_ NI	N/A
f) are containers in good condition? (265.171)  g) are containers compatible with waste in them (265.172)  h) are containers stored closed? (265.173(a))  i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  ii) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  iii) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  iii) containers inspected weekly for leaks and defects? (265.174)  iii) containers inspected weekly for leaks and defects? (265.174)  iii) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(ii))  iii) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iii) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))  iiii) inspection documents maintained on-site 3 years? (Rule 30	The following Subpart I, 265 170 to 265 177 requirements are referred to by Rule 306(1)(a) and 4	10 CFR 262	34(a)(1	)	
h) are containers stored closed? (265.173(a))  1) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  262C					N/A
h) are containers stored closed? (265.173(a))  1) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  262C	g) are containers compatible with waste in them (265.172)	262C	L1_	NI	N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))  j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)  k) are containers inspected weekly for leaks and defects? (265.176)  j) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))  m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))  m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))  m) are incompatible wastes stored in separate containers? (265.177(a))  o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))  p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))  Rule 306(2) & 40 CFR 262.34(c)(1)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).  3. If hazardous waste is being accumulated at the point of generation:  a) container(s) -55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))  b) container(s) under operator control & near the point of generation? (Rule 306(2):40 CFR 262.34(c)(1))  c) container(s) have words "Hazardous Waste"? (Rule 306(2):40 CFR 262.34(c)(1))  e) are container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) compatible with waste in them? (265.172)  a) mark the container(s) compatible with waste in them? (265.172)  b) move to an area with secondary containment, if required? (Rule 306(2): 40 CFR 264.175))  Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.  5. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		262C	[ ]	NI	N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)  k) are containers inspected weekly for leaks and defects? (265.174)  did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))  m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))  n) are incompatible wastes stored in separate containers? (265.177(a))  p) incompatible wastes put in unwashed containers that previously held incompatible waste. (265.177(b))  262C		262C	1	1 NI	N/A
k) are containers inspected weekly for leaks and defects? (265.174)  1) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))  262C	j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local	fire	2 22 110 7	20110	0.000000
I) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))  m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))  n) are incompatible wastes stored in separate containers? (265.177(a))  262C		262C		NI	N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))		262C		NI	N/A
n) are incompatible wastes stored in separate containers? (265.177(a))  o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))  262C		262C	[ ]	NI	N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))  p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))  Rule 306(2) & 40 CFR 262.34(c)(1)(l) both refer to 40 CFR 265.171, 265.172 & 265.173(a).  33. If hazardous waste is being accumulated at the point of generation: a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))  b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))  c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1))  d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  44. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste: a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))  65. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		262C.	[ ]	NI	N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c)) 262C		200000000000000000000000000000000000000	Г	- 9000	N/A
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))  b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))  c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))  d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  262C	The state of the s			NAME OF THE PARTY OF	N/A
33. If hazardous waste is being accumulated at the point of generation:  a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))  b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))  c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))  d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  262C	Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265	.173(a).		Tin #	
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))  b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))  c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))  d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  262C					- 1
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))  d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  e) are container(s) in good condition? (265.171)  262C		262C		NI	N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))  e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  4. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:  a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))  b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))  262C	b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C		NI	N/A
e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  262C	c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	LJ	NI	N/A
e) are container(s) in good condition? (265.171)  f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  262C		262C		- 1000000	L. DANIEL DE
f) are container(s) compatible with waste in them? (265.172)  g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  262C		262C		1	HAMPET H
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))  262C	and the same that a proper pro				Terrescone.
A4. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:  a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))  b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))  Characteristic Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.  35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include				-	
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))  b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))  262C		10 10 10 10 10 10 10 10 10 10 10 10 10 1	1	- 0.07	1,00050
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))  Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.  If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		262C	[ ]	NI	N/A
Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.  35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include					
35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include					
a) impervious base free of cracks? (264.175(b)(1)):		ıclude			
	a) impervious base free of cracks? (264.175(b)(1)):	262C	Ш_	NI	N/A
EQP 5163 (Rev. 3-2010) P		EQP 5163 (	Rev. 3-2	010) [	Page

YES NO

<ul><li>b) sloped or ot</li></ul>	nerwise designed to elevate/protect containers from contact with	liquids? (264.175(b)(2)) 2620	ᄓ	1	NI	N/A
c) hold 10% of	volume of containers or volume of the largest container, whichev	ver is greater? (264.175(b)(3)) 2620	C	]	NI	N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))				]	NI	N/A
e) accumulated	l liquids removed in a timely manner to prevent overflow? (264.17	75(b)5)) <b>2620</b>	; <u>L</u>	]	NI	N/A
NOTE: Closure of A	ocumulation Area covered under # 53.		7353			
	solids, (other than F020,F021,F022, F023, F026, F027), is haz wa	aste accumulation area sloped or				
	ned, or containers elevated or otherwise protected from contact w		; <u>L</u>	<u> </u>	NI	NIA
not accumulated	ste accumulated in other than tanks or containers? Or, is hazard, i.e.: process tank? DODD process tank? DODDD process tank.	swer. removed when closed	V		NI	N/A
	ected from weather, fire, physical damage & vandals? (Rule 306)	· / · //	; <u>L</u>	J	NI	N/A
into soil, directly	e accumulated so no hazardous waste or hazardous waste const or indirectly, into surface, ground-waters, drains or sewers, and s at 451, Part 55? (Rule 306(1)(f))		; <u>L</u>	J	NI	N/A
40. Is hazardous wa	ste accumulated in tanks? If so, complete Tani	k System inspection form.	1_	/	NI	N/A
41. Is hazardous wa	ste placed on drip pads? If so, complete Woo	od Preserving inspection form	_		NI	N/A
	Rule 306(1)(d) & 40 CFR 262.34(a) PERSONNEL TRAINING	(4) refers to 265.16 Jim Wen	re	1		
42. Did personnel re	ceive training? (265.16)	2620		<u>.</u>	NI	N/A
13. Do personnel tra	ining records contain the following:		#41.7			
a) job title? (26	5.16(d)(1))	2620	; L	J	NI	N/A
b) job descripti	ons? (265.16(d)(2))	2620	; L	]	NI	N/A
c) name of emp	oloyee filling each job? (265.16(d)(1))	2620	; L	]	NI	N/A
d) description of	f type & amount of both introductory & continued training? 265.16	6(d)(3)) <b>262</b> 0	) L	1	NI	N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)				]	NI	N/A
f) records of training? (265.16(d)(4))				J	NI	N/A
g) do new pers	onnel receive required training within 6 months? (265.16(b)	2620	; <u>L</u>	1	NI	N/A
h) do training re	ecords show personnel have taken part in annual training? (265.1	6(c)) 2620	; <u>L</u>	<u>.                                    </u>	NI	N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))				J	NI	N/A
	Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 2		7			
	ed/operated to minimize possibility of fire, explosion, release of his could threaten human health/environment? (265.31)			.saidol		i_ N/A
45. If required, does	this facility have the following:					
a) internal com	munications or alarm systems? (265.32(a))	2620	; <u>L</u>	<u>.</u>	NI	N/A
b) telephone or	2-way radios at the scene of operations? (265.32(b))	2620	; <u>L</u>	]	NI	N/A
c) portable fire	extinguishers, fire control, spill control equipment and decontamin	nation equipment? (265.32(c)) 2620	: [٧	1_	NI	N/A
d) adequate vo	ume of water and/or foam available for fire control? (265.32(d))	2620	: L	1	NI	N/A
46. Testing and Mair	ntenance of Emergency Equipment					
a) owner/opera	tor test & maintain emergency equipment to assure operation? (2	265.33) 2620	; <u>L</u>	]	NI	N/A
b) has owner/o	perator provided immediate access to internal alarms? Access to	alarm system is applicable only if required	(40 (	CFR 26	35. 3	32)
i) when haz	ardous waste is being poured, mixed, etc. (265.34(a))	2620	اَد	1	NI (	N/A
ii) if only one	employee on the premises while facility is operating. (265.34(b	2620	: [_		NI	V
c) aisle space f	or unobstructed movement of personnel/emergency equipment?	(265.35) 2620	1	1	NI	N/A
A STATE OF THE STA	1	onen card 2620		760	NI	
9	Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to	∅ o Subpart D, 265.50-265.56.				
8. Plan implemente	d whenever fire/explosion/release could threaten human health o		r :	1./	NI	N/A
	ency plan contain the following:	(2000 (0))		-44		6
	onnel must take responding to fires/explosions/unplanned release	of hazardous waste? (265 52/a & h)\ 2620	Г	1	NI	N/A
	ngements w/ local police, fire, hospitals, contractors, state & local		-	<del></del>	. 41	1417
	ervices; (265.52(c)) & (265.37(a)&(b))?	2620	[_	J	NI	N/A

	SPCC to be updated		422 V	40
	c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	<u> </u>	NI N/A
3)	d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[_1_	NI N/A
	e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	<u></u>	NI N/A
50.	Does the facility have an Emergency Coordinator? (265.55)	262C	<u></u>	NI N/A
	Emergency Coordinator and Emergency Procedures:			
-	a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	<u> </u>	NI N/A
	b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	<u></u>	NI N/A
20.7	c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[_]	NI N/A
N	<ul> <li>d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environm or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))</li> </ul>	ent 262C	<u></u>	NI N/A
51.	Contingency plan Amendments and Copies			1/2
	a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	Ш	NI N/A
	b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	ப_	NI N/A
	Rule 309 refers to 262, Subpart E except 262.54 & 262.55 INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)			
52.	Has the facility imported or exported hazardous waste?			Ni N/A
	a) exporting, has the generator:			
	i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	<u></u>	NI N/A
	ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	ш_	NI N/A
	iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	Ш_	NI N/A
	iv) complied with manifest requirements in Rule 309(2)(a-i).	262E	Ш_	NI N/A
	v) if required, was an exception report filled. (309(3)(a-c))	262E	<u> </u>	NI N/A
	b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	Ш_	NI N/A
	Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114 ACCUMULATION AREA CLOSURE (265.111 & 265.114)			
53.	The accumulation area must be closed in a manner that:			
	a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[[]	NI N/A
	b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	Ľı∠	NI N//
	c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C		NI N//
COI	MMENTS:  I. only MSDS. no analyses	*		
()				
_			(a	
S				8
·				A
			-	
//				

C-8 (blank)

Department of Natural Resources & Environment

UNIVERSAL WASTE LARGE QUANTITY HANDLER—really SQH,

(LQH) INSPECTION

Mot LQH.

Facility Name ROUSHENTER PRISES		_Part 2 Rules
Date 8 31 2012 I.D.# MID 094 555 299	75	_1994 PA 451
LQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices concrystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, merchalide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: them mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.	taining circ cury vapor,	uit boards, liquid neon, metal
A STATE OF THE PROPERTY OF THE		'A - Not Applicable)
PROHIBITIONS (Rule 228(5): 40 CFR 273.31)		YES NO
Does LQH dispose of universal waste? (Rule 228(5): 40 CFR 273.31(a))	273.C	[] NI N/A
<ol><li>Does LQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(5): 40 CFR 273.31(b))</li></ol>	273.C	[] NI N/A
NOTIFICATION (Rule 228(5): 40 CFR 273.32)  3. Did LQH notify DEQ of activities using form EQP5150 and did handler receive site identification number (before exceeded).	ding	<u>Lalt</u>
5000 kg)? (Rule 228(5): 40 CFR 273.32(a)(1))	273.C	[_] NI N/A
4. Did handler maintain the LQG designation to end of the calendar year? (Rule 228(5)(a): 40 CFR 273.32	273.C	[_] NI N/A
<b>WASTE MANAGEMENT</b> (Rule 228(5): 40 CFR 273.33)		
ANTIFREEZE: (Rule 228(5) (h) adopts Rule 228(4(h))	QTY HAI	NDLED: & blde
<ol> <li>Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, &amp; kept closed? Are transport vehicles &amp; vessels managed in the same way? (Rule 228(4)(h))</li> </ol>	73.C	L]NIN/A
6. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.C	NI N/A
<ol> <li>If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, &amp; 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST]</li> </ol>	273.C	L] NI N/A
<ol> <li>Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))</li> </ol>	273.C	NI N/A
9. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.C	NI N/A
BATTERIES: (Rule 228(5) adopts 40 CFR 273.33(a) requirements)	QTY HAI	NDLED: Ø Bldg
	'3.C	L]_ NI N/A
<ol> <li>Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, &amp; lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(5): 40 CFR 273.33(a)(1))</li> </ol>	273.C	NI N/A
12. Does the handler do any of the following w/ batteries as long as casings of batteries are not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(5): 40 CFR 273.33(a)(2))	273.C	NI N/A
<ol> <li>If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(5): 40 CFR 273.33(a)(3))</li> </ol>	273.C	NI N/A
<ul> <li>a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(5): 40 CFR 273.33(a)(3)(i))</li> </ul>	273.C	NI N/A
<ul> <li>b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 &amp; local requirements? (Rule 228(5): 40 CFR 273.33(a)(3)(ii))</li> </ul>	273.C	NI N/A
14. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(5): 40 CFR 273.34(a))	73.C	NI N/A
CONSUMER ELECTRONICS: (Rule 228(5) (g) adopts 228(4) (f) & (g))	QTY HAND	DLED: Ø Blda
15. Are electronics managed in a manner that prevents breakage or release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.C	L] NI N/A
16. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONIC or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	S" <b>273.C</b>	NI N/A
<ol> <li>Have releases been properly contained, &amp; have residues been characterized, &amp; properly disposed? (Rule 228(4)(f)(iii)</li> </ol>	273.C	NI N/A

4 years dags ago, fixtures changed & green bulbs justalled

18.	Does the handler do anything beyond any of the following with the electronics: Repair electronics for potential direct re (Rule 228(4)(g)(i)); Remove other universal wastes from consumer electronics (Rule 228(4)(g)(ii)); Remove modular components for direct reuse (Rule 228(4) (g) (iii))?	.c	<u></u> Ц.	NI N/	
	ELECTRIC LAMPS: (Rule 228(5) (d) adopts 228(4) (c))	TY HAND	Kup	vs som	eom
19.	Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) Note: different from EPA regulation	273.C		] NI N/	A
20.	Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(5)(d))  27	3.C	<u></u>	NI N//	4
21.	Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(5)(d)) Note: different from EPA regulation	273.C	LJ.	NI N//	A
22.	Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(5)(d)) Note: different from EPA regulation	273.C	<u></u>	NI N//	4
23.	If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(5)(d)) Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste	273.C	Ш.	NI N//	Δ
	a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272? (228(5)(d))	273.C	Ш	NI N//	4
	b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451? (228(5)(d))	273.C	டு	NI N//	A
_	MERCURY DEVICES: (Rule 228(5) (e) adopts 40 CFR 273.33(c))	TY HAND	LED:	Į4	
24.	Are devices managed to prevent releases? (Rule 228 (5)(e): 40 CFR 273.33(c))	273.C	Ш.	NI N//	4
25.	Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (5)(e): 40 CFR 273.33(c)(1))	273.C		NI N//	A .
26.	Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (5)(e): 40 CFR 273.34(d	) 273.C	<u></u>	NI N//	Δ.
27.	Does handler removing ampules meet the following conditions?	V)			
	<ul> <li>Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(i &amp; ii))</li> </ul>	273.C	ப_	NI N//	1
	b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(iii & iv))	273.C	ப_	NI N//	A .
	<ul> <li>c. Is facility area well ventilated &amp; monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (5)(e): 40 CFR 273.33(c)(2) (v))</li> </ul>	273.C	ப_	NI N/A	4
	<ul> <li>d. Does facility have employees familiar w/ proper waste handling &amp; emergency procedures?     (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vi))</li> </ul>	.c	ப_	NI N/A	4
	e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vi))  273	.c	ப_	NI N/A	4
	f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vii))	273.C	<u>LJ</u> _	NI N/A	١.
28.	When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (5)(e): 40 CFR 273.33(c)(3))	273.C	ப_	NI N/A	
29.	If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (5)(e): 40 CFR 273.33(c)(3)(i))	273.C	ப_	NI N/A	
	a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111?  (Rule 228 (5)(e): 40 CFR 273.33(c)(3)(ii))  273.	С	LJ_	NI N/A	
	<ul> <li>If waste is not hazardous waste, is it managed in compliance w/ Parts 115 &amp; 121 of Act 451, as applicable?</li> <li>Rule 228 (5)(e): 40 CFR 273.33(c)(3)(iii))</li> </ul>	273.C	<u></u>	NI N/A	
	PESTICIDES: Rule 228(5) (b) adopts 40 CFR 273.33(b) and 273.34)	Y HANDI	ED:		
30.	Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(5)(b): 40 CFR 273.33(b)(1))	273.C	<u></u>	NI N/A	
31.	If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(5)(b): 40 CFR 273.33(b)(2))	273.C		NI N/A	
32.	If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(5)(b): 40 CFR 273.33(b)(3))	273.C		NI N/A	
33.	If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(5)(b): 40 CFR 273.33(b)(4))	273.C		NI N/A	
34.	Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE PESTICIDE(s)" (Rule 228(5)(b): 40 CFR 273.34(b)(1 & 2) & (c)(1 & 2)) [See 273.14(c) if 273.34(b) not possible]	273.C	<u></u> _	NI N/A	

	PHARMACEUTICALS: (Rule 228(5) (f) adopts 228(4) (e))	TY HANDL	ED: _	
35.	Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of	, &	LJ_	_ NI N/A
36.	Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.C	Ш_	NI N/A
37.	Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.C	டு	NI N/A
38.	If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.C	LJ_	NI N/A
	ACCUMULATION TIME LIMITS (Rule 228(5): 40 CFR 273.35)			
39.	Is universal waste accumulated one year or less? (Rule 228(5): 40 CFR 273.35(a )) OR (if no go to question 40)	273.C		NI N/A
	If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal (burden on handler to demonstrate)? (Rule 228(5): 40 CFR 273.35(b))	273.C		_ ŅI N/A
41.	Is length of time universal wastes stored documented by one of the following:			
	<ul> <li>a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(5): 40 CFR 273.35(c)(1))</li> </ul>	273.C	<u></u>	NI N/A
	<ul> <li>b. individual items of universal waste marked or labeled w/ earliest date it became a waste??</li> <li>(Rule 228(5): 40 CFR: 273.35(c)(2))</li> </ul>	273.C	Ц_	NI N/A
11	<ul> <li>c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(5): 40 CFR 273.35(c)(3))</li> </ul>	273.C	<u></u>	_ NI N/A
	d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(5): 40 CFR (273.35(c)(4))	273.C	ப_	NI N/A
	F=1	73.C	Ц_	_ NI N/A
	<ul> <li>f. any other method when demonstrates length of time universal waste accumulated &amp; date it became a waste or received? (Rule 228(5): 40 CFR (273.35(c)(6))</li> </ul>	273.C	Ш_	_ NI N/A
	<b>EMPLOYEE TRAINING</b> (Rule 228(5): 40 CFR 273.36)			
42.	Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(5): 40 CFR 273.36))	273.C		_ NI N/A
	RESPONSE TO RELEASE (Rule 228(5): 40 CFR 273.37)			
43.	Are releases of universal waste & other residue immediately contained? (Rule 228(5): 40 CFR 273.37(a))	273.C	Ш_	NI N/A
S 100	Is material from release characterized? (Rule 228(5): 40 CFR 273.37(b))	273.C	Ш_	NI N/A
45.	If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(5): 40 CFR273.37(b))	273.C	LJ.	_ NI N/A
	OFF-SITE SHIPMENTS (Rule 228(5): 40 CFR 273.38 except 273.38(b)	) none	110	past
46	Is waste sent to another handler, destination facility or foreign destination? (Rule 228(5): 273.38(a))	273.C	<u> </u>	NI N/A
	If the LQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(5)(c): 40 CFR 273.38(b))	273.C	<u></u>	NI N/A
48	If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/marking/placards/shipping papers? (Rule 228(5): 273.38(c))	273.C	ш_	_ NI N/A
49	Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(5): 40CFR 273.38(d))	273.C	Ц_	_ NI N/A
50	If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:			
	a. receive the waste back? (Rule 228(5): 40 CFR 273.38(e)(1))	273.C	Ш_	_ NI N/A
	b. agree to where shipment will be sent? (Rule 228(5): 40 CFR 273:38(e)(1)	273.C	LJ_	_ NI N/A
51	If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss of	either:		
	a. sending the waste back to originating handler? : (Rule 228(5): 40 CFR 273.38(f)(1))	273.C	Ш_	_ NI N/A
	b. agreeing to where shipment will be sent? (Rule 228(5): 40 CFR 273.38(f)(2))	273.C	Ц_	_ NI N/A
52:	If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(5)(b)):40 CFR 273.38(g))	273.C	<u></u>	NI N/A
53	If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(5): 40 CFR 273.38(h))	273.C	Ш_	_ NI N/A
	TRACKING UNIVERSAL WASTE SHIPMENTS (Rule 228(5); 40 CFR 273	3.39)	ey q	pplie
54	Is there a record of each shipment when universal waste is received from another handler? (Rule 228(5) 40 CFR 273.39(a))	273.C		_ NI N/A
55	Does the record include:			
	a. name & address of originating handler or foreign shipper? (Rule 228(5): 40 CFR 273:39(a)(1))	273.C	<u></u>	_ NI N/A
	b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(a)(2))	273.C	[]_	NI N/A
-	c. date received? (Rule 228/5): 40 CER 273 39(a)(3))	273.C	T 1	NI N/A

a. the name & address of the universal waste handler, designation facility or foreign destination? (Rule 228(5): 40 CFR 273.39 (b)(1))  b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(b)(2))  c. date shipped? (Rule 228(5): 40 CFR 273.39(b)(3))  58. Are records kept at least for 3 years? (Rule 228(5): 40 CFR 273.39(c)(1&2))  EXPORTS (Rule 228(5): 40 CFR 273.40)  59. If waste is sent to a foreign destination does handler: a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))  b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  c. provide copy of EPA Acknowledgment of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  30. Does transporter dispose of universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))  273.D [ ] NI NI/A  31. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))  273.D [ ] NI NI/A  34. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste s "hazardous waste, (f) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6): 40 CFR 273.55(b))  273.D [ ] NI NI/A  35. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)			2/4/-54	
a. the name & address of the universal waste handler, designation facility or foreign destination? (Rule 228(5): 40 CFR 273.39 (b)(1))  b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(b)(2))  c. date shipped? (Rule 228(5): 40 CFR 273.39(b)(3))  58. Are records kept at least for 3 years? (Rule 228(5): 40 CFR 273.39(c)(182))  EXPORTS (Rule 228(5): 40 CFR 273.40)  59. If waste is sent to a foreign destination does handler:  a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4.86) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))  b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  c. provide copy of EPA Acknowledgment of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  273.D _ [ ] NI N/A  10. Does transporter dispose of universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))  273.D _ [ ] NI N/A	56. Is there a record of each shipment of universal waste shipped to another handler? (Rule 228(5): 40 CFR 273.39(b))	273.C	டு_	_ NI N/A
Rule 228(5): 40 CFR 273.39 (b)(1))   273.C     NI N/A	57. Does the record include:			
c. date shipped? (Rule 228(5): 40 CFR 273.39(b)(3))  58. Are records kept at least for 3 years? (Rule 228(5): 40 CFR 273.39(c)(1&2))  EXPORTS (Rule 228(5): 40 CFR 273.40)  59. If waste is sent to a foreign destination does handler:  a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))  b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262.5(a)(a) 40 CFR 273.40(b))  c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(b))  TRANSPORTER (Rule 228	(Rule 228(5): 40 CFR 273.39 (b)(1))	273.C	ப_	_ NI N/A
EXPORTS (Rule 228(5): 40 CFR 273.40)  EXPORTS (Rule 228(5): 40 CFR 273.40)  EXPORTS (Rule 228(5): 40 CFR 273.40)  If waste is sent to a foreign destination does handler:  a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57?  (Rule 228(5): 40 CFR 273.40(a))  D. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))  Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))  Transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.51(b))  Transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6): 40 CFR 273.56(a))  Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56(b))  To be has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(b))  To be has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(b))  To be has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(b))  To be has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(b))  To be has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(b))  To be harded to the control of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(b))  To be harded to the control of EPA Acknowledgement of Consent with s	b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(b)(2))	273.C	ப_	_ NI N/A
EXPORTS (Rule 228(5): 40 CFR 273.40)  59. If waste is sent to a foreign destination does handler:  a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))  50. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  773.C  773.	3 22 27.11	273.C	LJ_	_ NI N/A
if waste is sent to a foreign destination does handler:  a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))  b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.54))  TRANSPORTER (Rule 228(6): 40 CFR 273.55(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.55(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.56)  TRANSPORTER (Rule 228(6): 40 CFR 273.56(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.56(b))  TRANSPORTER (Rule 228(6): 40 CFR 27	58. Are records kept at least for 3 years? (Rule 228(5): 40 CFR 273.39(c)(1&2))	273.C	Ц	_ NI N/A
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))  b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))  Transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.51))  If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))  Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6): 40 CFR 273.56(b))  Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)  NI NIA  c. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))  273.D   NI NIA  NI NIA  C. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))  273.D   NI NIA	<b>EXPORTS</b> (Rule 228(5): 40 CFR 273.40)	3	8	
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  c. provide copy of EPA Acknowledgment of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.54))  TRANSPORTER (Rule 228(6): 40 CFR 273.56)  TRANSPORTER (Rule 228(6): 40 CFR 273.56))  TRANSPORTER (Rule 228(6): 40 CFR 273.56(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.56(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.56(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.56(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.56(b))  TRANSPORTER	59. If waste is sent to a foreign destination does handler:			
Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))  c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(a))  TRANSPORTER (Rule 228(6): 40 CFR 273.51(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.52(b))  TRANSPORTER (Rule 228(6): 40 CFR 273.55(b))  TR		273.C	ш	_ NI N/A
TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53) Probably YES, do Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))  10. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))  11. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))  12. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))  13. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))  14. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))  15. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)  16. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56(a)  17. NI N/A  18. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56(a)  18. NI N/A  19. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56(b))  19. NI N/A  273.D		273.C	ப_	_ NI N/A
50. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))  51. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))  52. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))  53. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))  54. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))  55. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)  56. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56(a)  573.D  573.D  573.D  573.D  674. NI N/A  575.D  575.D  675.D  676.D  677.D  677.D  777.D  77	c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))	273.C	<u>LJ_</u>	NI N/A
273.D	TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273,50, 53'	probab	en ye	es, d
If transporting responds to release, do they immediately contain it and characterize residue?  If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))  273.D  I universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements?  (Rule 228(6): 40 CFR 273.54))  273.D  I NI N/A  14. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))  273.D  I NI N/A  15. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)  Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)?   CRULE 228(6): 40 CFR 273.56(a)  273.D  I NI N/A  C. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))  273.D  I NI N/A  NI N/A		The second contract of	[	] NI N/A
If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))  273.D  If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))  273.D  IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	61. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	[	] NI N/A
(Rule 228(6): 40 CFR 273.54))  273.D  L] NI N/A  4. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))  5. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)  b. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)  c. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))  73.D  NI N/A  1 NI N/A  273.D  1 NI N/A  273.D  273.D  1 NI N/A	<ol> <li>If transporting responds to release, do they immediately contain it and characterize residue?</li> <li>If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))</li> </ol>	273.D	<u> </u>	_ NI N/A
is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))  273.D  I NI N/A  Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))  273.D  NI N/A  Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.56(b))  273.D  NI N/A  C. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))  273.D  NI N/A  273.D  NI N/A		273.D	<u></u>	NI N/A
(Rule 228(6): 40 CFR 273.56)  b. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)  c. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))  273.D  NI N/A  273.D  NI N/A	is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste. (I) or (s), n.	o.s."	<b></b> _	NI N/A
c. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))  273.D I NI N/A		273.D	<u></u>	NI N/A
	b. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[]	NI N/A
	c. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	r 1	NI N/A
	probably Clean Lights managed some name confusion Clean Light of &	hen	Ling	ft
			0.8	//·
				S .
		-1-101		
		-	(4)	
			(6)	
			*	
			*	
			9	
				2
				-
				- 10 - 20 - 20 - 20 - 20 - 20 - 20 - 20 - 2

EQP5185 (Rev.3-2010) Page 4

C-12

# **ATTACHMENT D Document(s) Copied**

				•
				*
•				•
•				
				•
·				
			•	
			2	
		•		•
•				
	•			
	•			
			,	
	•		•	
			•	
				-
·.				
		÷		
•			•	

#### Mark R. Gomez

From:

Keller, Shannon [keller.shannon@cleanharbors.com]

Sent:

Friday, August 31, 2012 10:47 AM

To: Cc: Mark R. Gomez Castro, Trina

Subject:

FW: EPA - LDR Question

Mark,

Please see explanation below. Let us know if you have any further questions. Thank you.

Shannon Keller Clean Harbors Environmental Services Account Manager keller.shannon@cleanharbors.com office/cell 313-549-8463

From: Wright, April D

**Sent:** Friday, August 31, 2012 10:29 AM **To:** Keller, Shannon; Castro, Trina **Subject:** RE: EPA - LDR Question

I received clarification from Jay.

Since this includes the D001 for non-wastewaters being treated by CMBST, (incineration or fuel) or RORGS-(distillation/solvent recovery), UHCs are not required to be identified on the LDR.

The F listed solvents fall under the constituents of concern which is why they are checked yes.

The constituents subject to treatment category is only for those wastes shipping under an alternate standard, i.e. alternate debris standard, alternate soil standard, etc. Typically streams we would see for landfill.

#### **Thanks**

April Wright
Central Profile Representative
Clean Harbors Environmental Services
42 Longwater Dr.

Norwell, MA 02061-9149 Office: 781-792-5425

Fax: 781-792-1097

Email: wright.april@cleanharbors.com

Web: www.cleanharbors.com

----Original Message-----From: Keller, Shannon

Sent: Friday, August 31, 2012 9:28 AM

	•	•	

To: Castro, Trina; Wright, April D; CPGW

Subject: RE: EPA - LDR Question

profile CH235257

Shannon Keller Clean Harbors Environmental Services Account Manager keller.shannon@cleanharbors.com office/cell 313-549-8463

----Original Message----

From: Castro, Trina

Sent: Thursday, August 30, 2012 5:13 PM

To: Wright, April D; CPGW

Cc: Keller, Shannon

Subject: Re: EPA - LDR Question

Was it attached

---- Original Message ----

From: Wright, April D

Sent: Thursday, August 30, 2012 05:00 PM

To: Castro, Trina; CPGW Cc: Keller, Shannon

Subject: RE: EPA - LDR Question

What is the profile number?

April Wright

Central Profile Representative Clean Harbors Environmental Services

42 Longwater Dr.

Norwell, MA 02061-9149

Office: 781-792-5425 Fax: 781-792-1097

Email: wright.april@cleanharbors.com

Web: www.cleanharbors.com

----Original Message----

From: Castro, Trina

Sent: Thursday, August 30, 2012 4:31 PM

To: CPGW

Cc: Keller, Shannon

•		•

Subject: FW: EPA - LDR Question

Importance: High

CPG.

Please advise.

I don't see any underlying haz constituents listed on the profile thus the "N" but if you could give your professional opinion we would appreciate it. thank you

----Original Message----

From: Mark R. Gomez [mailto:mark.gomez@roush.com]

Sent: Wednesday, August 29, 2012 5:07 PM

To: Keller, Shannon

Subject: FW: EPA - LDR Question

Importance: High

Shannon,

Inspector from EPA wants to know why the column "Underlying Hazardous Constituents" and "Contaminants Subject to Treatment" are marked "N".

I need this reply by early Friday 8/31 am. She will be back.

Thank you!

Mark R. Gomez EH&S Coordinator Roush Industries Desk: 734-779-7266

Cell: 248-760-3577 Fax: 734-779-7919

----Original Message----

From: multidevice@roush.com [mailto:multidevice@roush.com]

Sent: Wednesday, August 29, 2012 5:04 PM

To: Mark R. Gomez

Subject: Scanned from B07 Facilities

Please open the attached document. It was scanned and sent to you using a Xerox multifunction device.

		•
		,
	·	
•		
	•	
		· · · · · · · · · · · · · · · · · · ·

Sent by: Guest

Attachment File Type: pdf

multifunction device Location: machine location not set

Device Name: XRX\_9C934E03BC3B

For more information on Xerox products and solutions, please visit http://www.xerox.com

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact Clean Harbors Environmental Services at 781.792.5555 and delete the material from any computer.

		•		•	
			•		
					-



## GE Consumer & Industrial

## Lighting

1975 Noble Road Nela Park Cleveland, OH 44112 (216) 266-9729

### **Certificate of Analysis**

#### **Reporting Analytical Lab**

Alpha Analytical Labs Westborough, MA 01581-1019

DATE: October 2002

DESCRIPTION: T8 GE Ecolux Fluorescent Lamps

MODEL: F32T8/SPX50/ECO

#### Test

Toxicity Characteristic Leaching Procedure (TCLP) for Mercury EPA Method 1311 of Test Methods for Evaluating Solid Waste Physical/Chemical Methods, SW-846

Tested in accordance with NEMA Standard, NEMA LL 1, "Procedures for Linear Fluorescent Lamp Sample Preparation and the TCLP."

#### TCLP Maximum Allowable Concentration for Mercury

- 0.200 mg/Liter (USA)
- 0.100 mg/Liter (Canada)

NUMBER OF LAMPS: 10

#### Result Summary

Average Result: 0.023 mg/Liter

Standard Deviation: 0.015

90% Confidence Limit: 0.031 mg/Liter

TCLP RESULT: PASSED - USA & CANADA

	•		•	
		•		
·				



# GE Consumer & Industrial

## Lighting

### **Lamp Material Information Sheet**

#### Material Safety Data Sheets (MSDS) Information and Applicability

The Material Safety Data Sheet (MSDS) requirements of the Occupational Safety and Health Administration (OSHA) for chemicals are not applicable to manufactured articles such as lamps. No material contained in a lamp is released during normal use and operation.

The following information is provided as a service to our customers. The following Lamp Material Information Sheet contains applicable Material Safety Data Sheet information.

#### I. Product Identification

**GE Ecolux® Fluorescent Lamps** 

**GE Consumer & Industrial** Lighting 1975 Noble Road Nela Park Cleveland, OH 44112 (216) 266-2222

#### II. Lamp Materials and Hazardous Ingredients

#### Glass & Metal

The glass tube used in this fluorescent lamp is manufactured from soda-lime glass and is essentially similar but not identical to that used throughout the glass industry for bottles and other common consumer items. The end-caps on the lamp are generally aluminum while the wires in the lamps (called filaments or cathodes) are made of tungsten.

#### Phosphor

The Ecolux product line uses two different phosphor systems. One phosphor system (halophosphate) uses calcium chloro-fluoro-phosphate, with small amounts (less than 1-2% by weight the phosphor) of antimony and manganese, both of which are tightly bound in the phosphor matrix. The second phosphor system (SP/SPX) uses a mixture of rare earth elements such as lanthanum, and uttrium as either an oxide or as a phosphate, along with a barium/aluminum oxide. These phosphors produce better lamp efficiency and color rendition. The phosphor components may vary slightly depending on the color of t he lamp (cool white, warm white, etc.).

#### Mercury

While mercury is present in small amounts in all fluorescent lamps, the Ecolux lamp uses the lowest amount of mercury of any GE Lighting lamp of the same type. The amount of mercury present in any

17-6

			•	
r.e.				

given lamp will vary slightly, but the target dose for Ecolux is over 85% less than the average for traditional fluorescent lamp designs of the same type. The average target dose for the F40T12 Ecolux lamp and the F32T8 Ecolux lamp is very low and optimized to balance performance requirements with environmental concerns.

### Metals

Internally, the support wires used in the lamp construction are made from nickel-coated iron, stainless steel, molybdenum, or niobium, while the electrodes are tungsten. Many of the ceramic metal halide types will use a brass base and have lead-soldered connections to that base.

#### III. Health Concerns

#### Phosphor

Except for small modifications, the halophosphor is essentially the same material that has been in use in GE lamps for over fifty years. The Industrial Hygiene Foundation of the Mellon Institute found no significant adverse effects, either by ingestion, inhalation, skin contact, or eye implant, in a five-year animal study of the original phosphor. Also, there have been no significant adverse effects on humans by any of these routes during the many years of its manufacture or use. The phosphor is somewhat similar to the inert mineral apatites (calcium phosphate-fluorides) that occur in nature. Antimony, manganese, yttrium and barium compounds are characterized by OSHA as hazardous chemicals, as are most inorganic compounds. However, due to their insolubility, relatively low toxicity and small amount present in the phosphor and the lamp, these materials do not present a significant hazard in the event of breakage of the lamp.

#### Mercury

Neither the mercury nor the phosphor concentration in air produced as a result of breaking one or a small number of fluorescent lamps would result in significant exposure levels. However, when breaking a large number of lamps for disposal, appropriate industrial hygiene monitoring and controls should be used to minimize airborne levels or surface contamination. Such work must be done in a well-ventilated area. Local exhaust ventilation and personal protective equipment such as respirators may be needed.

### IV. Disposal Concerns

### **TCLP**

Ecolux fluorescent lamps consistently pass the EPA Toxicity Characteristic Leaching Procedure¹ for mercury by significant margin. Therefore, federal EPA does not classify Ecolux lamps as hazardous waste.

Ecolux TCLP test results are available at www.gelighting.com.

While Ecolux lamps will pass the federal EPA TCLP test, state and/or local regulations may still regulate the disposal of mercury-containing products. To check state regulations or to locate a recycler, go to www.lamprecycle.orgT.

	·	



WORLDWIDE PARTNER

Commercial Products & Sciutions

SITE SEARCH

- HOME

**♥ PRODUCTS** 

EDUCATION / RESOURCES

LIGHTING APPLICATIONS

a→ PRINT

Where to Buy | FAQs | Contact Us | EliteNet

Products > 42064

#### 42064 - F32T8/SPX50/ECO

GE Ecolux® Starcoat® T8

· Passes TCLP, which can lower disposal costs.

High Color Rendering

### GENERAL CHARACTERISTICS

Lamp type	Linear Fluorescent - Straight Linear
Bulb	T8
Base	Medium Bi-Pin (G13)
Wattage	32
Voitage	137
Rated Life	20000 hrs
Rated Life (instant start) @ Time	20000 h @ 3 h 24000 h @ 12 h
Rated Life (rapid start) @ Time	24000 h @ 12 h
Bulb Material	Soda lime
Starting Temperature (MIN)	10 F (-12 °C)
Picograms of Mercury	74 picograms
Additional Info	TCLP compliant

#### PHOTOMETRIC CHARACTERISTICS

Initial Lumens	2800
Mean Lumens	2660
Nominal Initial Lumens per Watt	87
Color Temperature	5000 K
Color Rendering Index (CRI)	86

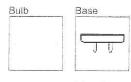
#### **ELECTRICAL CHARACTERISTICS**

Open Circuit Voltage (rapid start) Min @ Temperature	315 V @ 10 °C
Cathode Resistance Ratio - Rh/Rc (MIN)	4.25
Cathode Resistance Ratio - Rh/Rc (MAX)	6.5
Current Crest Factor (MAX)	1.7

#### DIMENSIONS

Maximum Overall Length (MOL)	47.7800 in (1213.6 mm)
Minimum Overall Length	47.6700 in (1210.8 mm)
Nominal Length	48.000 in (1219.2 mm)
Bulb Diameter (DIA)	1.000 in (25.4 mm)
Bulb Diameter (DIA) (MIN)	0.940 in (23.8 mm)





View Larger

### ADDITIONAL RESOURCES

Catalogs

#### Testimonials

### Brochures

Product Brochures

- Ecolux
- Linear Fluorescent Lamps
- Ecolux (Environmental)

Application/Segment Brochures

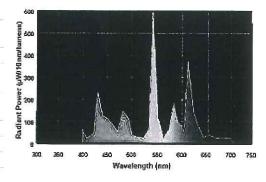
- Retail Lighting
- Office Lighting
- Healthcare Lighting
- Centractor Lighting

MSDS (Material Safety Data Sheets)

Disposal Policies & Recycling Information

#### **GRAPHS & CHARTS**

#### Spectral Power Distribution



5-8

•	•		
		•	

LIG	ase pii	int or type. (Form designed for use on elite (12-pitch) typewriter.)		9 5 7			n Approved, OMB N	0. 2050-0039
<b>A</b>	UNIF		3. Emergency Response		4. Manifest T	racking Nu	umber	
	W.	ASTE MANIFEST / TO TO TO THE STATE OF THE ST	1-616-601-	\$72%·		241	0416	FLE
ļŀ	5, Ge	enerator's Name and Mailing Address	Generator's Site Address	(if different tha	n mailing addres	S)	V	
ř	241		alta S				•	
			n (-a g ) A S					
Ш		1 3 Cd - 200 D						
Ш			944 TV 3414T 1 2	i i i			······································	
$\  \cdot \ $	0. 118	ansporter 1 Company Name			U.S. EPA ID N	lumber		
		fotal flam life fragmenter of Mi				atė e	名号 化红色 电基系	
Ш	7. Tra	ensporter 2 Company Name			U.S. EPA ID N	umber		
Ш								
İΙ		signated Facility Name and Site Address			U.S. EPA ID N	lumber		
	4	STAL PLASE LTD PARTYSPUSED OF MI						
Ш	1	i program ava						
Ш		\$A\$K\$Phone:- 65 K- 5			I	1918 d.	49 882 329 -	
			40.0					
	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Contai		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Co	des
	I IIVI	1.	No.	Type	Quality	. VVL/VOI.	1	2
⊭							a state	
		AUTOMOTIVE 1/3 LT		l	I was made		distribution of the state of th	e was majorije e was a jorganie.
品	<u></u>		0.01	indeply (	<u>275</u>	- 6		1
GENERATOR		2.					- Control of the Cont	
۱٩							a state at the first of the state of the sta	
								1.5
i I		3.		İ			4	
Ш								atani da manana ana ana ana ana ana
								and the second
		4.						)
-	454	·						
	14. S	t pecial Handling Instructions and Additional Information					;	
Ш.		FOREGIGLE (CRANKCASE OIL)						
Ш		Case of Emerodocy contact crystal flash at 1-1						
П		CASE OF SPILL CONTAIN WITH ABSORBANT MATERIAL /	and Vacenda	110				
Ш	15	GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment a marked and labeled/placarded, and are in all respects in proper condition for transport according to applica	re fully and accurately de	scribed above	by the proper shi	pping name	, and are classified, pa	ckaged,
Ш	3.7	Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowle	edgment of Consent.	ional governme	inai regulations.	ii export Sii.	nhuneur and i am me is	iliary
Ш		I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity gene		all quantity gen	erator) is true.			
	Gene	Control of the Contro	ature				Month C	ay Year
\ \display:	Na <sub>n</sub>	USG-SL HUTCHMAN IN	- WAL	- Uzza				
L	16. In	ternational Shipments Import to U.S. Export from U	S. Port of er	à		1		189
TR ANSPORTER INT'L	Trans	sporter signature (for exports only):	Date leav		J			
胀		ransporter Acknowledgment of Receipt of Materials		· · · · · · · · · · · · · · · · · · ·	, e <sup>-</sup>			- 1
듄		· · · · · · · · · · · · · · · · · · ·	ature /		11 2	jk	Month D	ay Year
2		Mobalt Hakel	1.7	and the second	the same of the sa			5 I 💨
18	Trans		ature				Month D	ay Year
2	14						1 1	1
<u>-</u>	18 Di	iscrepancy						<u>l</u>
П	-	Discrepancy Indication Space						
	ioa. L	Quantity	Residue		Partial Reje	ection	Full £	Rejection
1	4.5		•				*1	
>	1.9h A	Alfernate Facility (or Congrator)	Manifest Reference	e Number;	He Feviers	b	<u> </u>	
	100. 4	Alternate Facility (or Generator)			U,S. EPA ID N	umber	. " " •	
Ş								
Ę		ty's Phone:		· .				
囯	18c. S	Signature of Alternate Facility (or Generator)				-	Month I	ay Year
GNATED FACILITY								
3	19. Ha	azardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal,	and recycling systems)					
	1.	2. 3.			4.			
É		美養養養養	147.4					
	20. De	esignated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manife	est except as noted in Iter	n 18a				
			ature				Month D	ay Year
		ı						\$.   <del>\$</del> .
								7 1 7

Loc: DETROIT Route: Please print or type. (Form designed for use on elite (12-pitch) typewriter.)								<b>研心学:</b> Form Approved, OMB No. 2050-0039						
150		ORM HAZARDOUS 1	Generator ID Nur	nber		1 .		ncy Response		4. Manifest	Tracking Nu	ımber		BF
		ASTE MANIFEST   Perator's Name and Mailing	MII	9820	62317	1 1	<u> </u>	-424-9 s Site Address	`	an mailing addres		<u>.529</u>	<u>4                                    </u>	
	o. Gen	ватог в гата ако мавну	Mousess Ro	OSK I	own Ra	PS 1331	Jones and	, 51,5 . 125,505	in amerant in	,	,			
		_	1 /	50 3r	own Ka	L 1277/								
		ator's Phone: () () () ()	393-6	7.4.3	ills, Mi	70506		-1/1-de	- Comment of the Comm	U.S. EPAID I	Vumber			
	HERITASE-CRYSTAL CLEAN, LLC ILRO											013	0 O E	2
	7. Transporter 2 Company Name U.S. EPA ID Number													
	8. Designated Facility Name and Site Address U.S										Number			
	H.	C IMSTER	OFF LOAD	SITE						īL	R O O	013	006	5 2
	2 I	7140 BRÍNCE NKSTER, MÍ	49141				/ 🛭	47)836	5 <u>-</u> 5670	: 1				
		y's Phone: 9b. U.S. DOT Description	linch dina Proper	Chinning Name Ha	zard Class ID Num	har	10	10. Contai		11. Total	12. Unit	1		
	9э. НМ	and Packing Group (if an	ž.) Š.)) L (Hřistotil A. Linhai -	Ollibhilid Hallie' Ha	Zale Olass, to Hull:			No.	Туре	Quantity	WI,/Val.	13. W	aste Codes	
<u>₩</u>		LEST DOWN	RA REGVI	LATED (US	ED OIL)				,			221		
MTO							6	20/	77	005	6		į	
GENERATOR		2 N OT/RO	ra regui	LATED (US	ED OIL,	WATER)		· · · · · · ·					İ	
<u>5</u>												1		
		3.									Ì		İ	
												<del> </del>		
		4.						10000-00-00-00-00-00-00-00-00-00-00-00-0						
	1 0	pecial Handling Instructions	A d dist t_s_6	ann ation								1		
	14. 3	pecial matiding hiseococha	and Someous and	JIM:20011										
	15.	GENERATOR'S/OFFEROR	R'S CERTIFICATIO	N; I hereby declara	e that the contents o	of this consignmen	nt are fully ar	id accurately d	lescribed abov	e by the proper s	hipping nam	ne, and are class	iñad, pack	aged,
		marked and labeled/placare	ied, and are in all r	espects in proper a signment conform to	endition for transpor the terms of the at	rt according to app tached EPA Ackno	plicable inten owledoment i	national and na of Consent.	ational governr	nental regulation	s. If export s	hipment and I a	m the Prima	ary
		I certify that the waste mini	nization statement	identified in 40 CFF	R 262,27(a) (if I am	a large quantity g	enerator) or (b) (if I am a small quantity generator) is true.						Year	
$\left  \right $	Gene	rator signeror s Printeor Lyp		e 7501	. [7		Al	en -	يركيب أكسيا	-67	to and managed with the second	-P	7124	( /2
INT	16. ln	temational Shipments	Import to		in constant	Export from	πU.S.		entry/exit:	V				
		sporter signature (for expor ransporter Acknowledgment		rials				Date lea	rving U.S.:					
TR ANSPORTER	Trans	portex 1 Printed/Typed Nan	18	,		5	Signature	and the same	The state of the s		Edward Comment	Mont	1	Year
SPC	Tenno	sporter 2 Printed Typed Nar		ida=	<u> </u>		يسسب Signature	1		tur	~	O Mon		
IR Ai	110113	species 2 i ilineary ped 14di				1								]
1		iscrepancy												
	18a. I	Discrepancy Indication Spa	ce Quar	ntity	Тура	8		Residue		Partial R	ajection	L	Full Rej	ection
						7744	Ma	ınifest Referen	ice Number:				·	
L	195.7	Alternate Facility (or Gener	ator)							U.S. EPA IC	) Number			
FACILITY	Facili	ity's Phone:												
TED	18c.	Signature of Alternate Facil	ity (or Generator)									Moi	nth Da	y Year
DESIGNATED	10.11	iszardous Wasie Report M	ennamaet Molhod	Codes li e codes	for hazardous west	e Irealment riser	nsal, and rec	volina systems	)					
DESI	1.	iacardous vvasie Report Mi	падашын менко	2.	ION HEIZELUCUS WEST		3.	,	· · · · · · · · · · · · · · · · · · ·	4.				
		<u> # 141</u>							i 10-			MICHIGAN		//
		Pasignated Facility Owner or ad/Typed Name	r Operator: Certific	ation of receipt of h	azardous materials		anifest excer Signature	n as noted in N	iem iga	7 3 9 10 4		Mor	ith Day	Year
$\prod$		••												

CRYSTAL FLASH ENERGY 754 ALPINE AVE. N.W.	WEEK	BIL.	L OF LADING	ROUTE	TERMS
FRAND RAPIDS, MICHIGAN 49504 -800-280-6227 * 616-365-0012	ACCOUNT NUMBER	/S- purchase o	1)-114 order#	EPA ID#	
X 616-365-8347	80/2571	<u>009                                   </u>	COMMEN	MIG05	4354295
ERVICE LOCATION				REQUESTED BY	
ROUSH Indus 12068 Mo 13454028 Livonia	tres #18 volket St 48150 m.	CARRIER C	Crystal Flash En 754 Alpine Ave Grand Rapids, M	e. NW	
T.T.		OF LADIN	G		TOTAL UNITS
<u>u</u> 450	sd oil	ner .			275 gel
MANF# 0624	(N418-1	21P			
SHIPPER ROOSH INC	1,0418-1 1, #28 0		rystal Flash Ene	ergy /	1
DATE: C-12.5		ER: ATE:	<i>/1)_/</i> C	1 CMC 18-5	
AFRGENCY RESPONSE TELEPHONE NUMBER			Solution    mber is monitored acidental to transport		Materials is in transportation
	SUMMARY OF PRIC		RRENT CHAR	CGES	
Prod Description	SI Comments	7	 つつ	Unit Price  Sel	Qty Total Charge
8080-9 5088-19	Fuel Rec	overz	- 4	) gar	-9.27
3000		160	8		#182
	(	( 岩)	194)		
CESQG Certification  I certify that my hazardous waste streams total less than 220 lbs	Chlor-D-Test Under 1000 PPM	Generator Knowledge		real re	utsta?
(100kg) for this calendar month and that I am not required to obtain an EPA identification number. Generator Initials	Certificate of Generator - I swear an substance that are contained in those	Rebuttable	herwise disclosed to Crys	tal Flash, the wastes described abo	ve are not hazardous wastes. Any hazard
	administrative practices and operation	onal procedures (or hav	re supervised that review)	and this certification is true, accur	ate and complete.
		-	Ο Γoday's Charges .		
	Crystal Flash Energy				
Crystal Flash Gran	P.O. Box 1804 nd Rapids, Michigan 4	19501 <sup>S</sup>	Sales Tax		$-\mathcal{M}_{I}$
	365-0012 or 800-280-	6227	Fotal Amount Du	e	_/
	D-	-13	Total Remittance	(Check #)	

	4		Liver on alife (12-n	itch) typewriter.)	538 <b>40942</b> _	9	C PPW	3/3/201	1	Form	Approved.	OMB No. 2	2050-0039
eas	e pri	nt or type. (Form desk	gned for use on elite (12-p 1, Generator ID Number	itti) typewitten)	2. Page	3. Emerge	ncy Response	Phone	4. Manifest Tr	acking Nu 2000	mber QQ⊅	<u> 1 F</u>	IF
ון ל	UNIF W	FORM HAZAKUUUS ASTE MANIFEST	MID09455	5299	700	(800)	483-37	18	mailing address	<u> </u>	<u> </u>	<u> </u>	
		enerator's Name and Mail	ing Address			Generator	Salle Address	(N OWNERS WITH	Titleaming book and	,			
Ш	Ro	ush Manufactu	ring			12061	Market	Street					
П	11	916 Market St vonia, MI 4815	reet A		ı		a,MI 481						
Ц	Gene	erator's Phone: 7241 ansporter 1 Company Na	779-7266 AT	M:Mark:Gome	2	217210			U.S. EPAID N	ımber			
П				·					M A D (	393	3222	50	
╽┟	<u>Ç</u>	ean Harbors El ansporter 2 Company Na	mironmental Serv	1025 Inc		-			U.S. EPA ID No	ımber			
Н		•		i .					MADO	39:	3222	250	
11	. C	esignated Facility Name	nvironmental Servand Site Address	HA-> IIIL					U.S. EPA ID N	umber			Ì
$\ $	Sr	oring Grove Res	ource Recovery li	nc					OHD	0008	3166	29	
П	4(	379 Spring Gro incipnati. OH 4!	5232										
Н	Fac	lity's Phone:	(513) 581 5738 ption (including Proper Shippir	on Name, Hazard Class	10 Number.	$\overline{}$	10. Conta	iners	11. Total	12. Unit	1	3. Waste Coo	ies
	9a. I HM	I Donathan Commit	poon (including Proper Shippii if any))	ig Home, hazara a ara-			No.	Туре	Quantity	Wt./Vol.			
11	C)IVI			TER SERTERIA	2 00 11		-				0001	D035	F003
용		UN1263. W	ASTE PAINT RELA	IED WAIEKIA	., 3. PG II		10	h _	4800	P	<u> </u>		
Æ	X	Į					10-	URS	1 800	<b>V</b>	F005	<u> </u>	
GENERATOR	ļ	2.											
Ö								1					
П	L	<u> </u>						<del> </del>		1 -			
		3.								1			
	1	1											<del> </del>
	-	4.			-					1	1		
	ļ	l l				·					C. S. S. S. S. S. S. S. S. S. S. S. S. S.		
H					<u></u>				<u> </u>	1			
Н	14.	. Special Handling Instruc	tions and Additional Information	on									
		marked and labeled/p Exporter, I certify that I certify that the waste	EROR'S CERTIFICATION: 1 lacarded, and are in all respective contents of this consignment identification statement identification statement identification.	es in proper containon to	of the attached EPA Ackn (i) (if I am a large quantity of	owledgmen generator) o	t of Consent.	· •	•	hipping nar s. If export	me, and are shipment ar		ackaged, rimary Day Year
	G	enerator's/Offeror's Printe	d/Typed Name			Signature	1					I	1
	,	MATT	SCOTT	·	<u>1</u>		Man					10 11	3 144
INT	16	i. International Shipments	import to U.S	3.	Export fro	om U.S.		f entry/exit:				- · · · <del>- · · -</del>	
_		ransporter signature (for	exports only):				Date le	eaving U.S.:					
	17	7. Transporter Acknowleds ansporter 1 Printed/Type	ment of Receipt of Materials			Signaty y		- N	4			Month (	Day Year
Š	5 "	Λ			ì	M		7 /bs	( <u> </u>			عليهاء	3 44
ğ		ransporter 2 Printer Type	d Name	1 - 1		Gralus)						Monin	Day Year
TO AMEDICAL	2	1 1: 4/1 .	MARC ACUTO	4 Mosk	£	[ <u>]</u>	n ste	<u> </u>			<u> </u>	L <b>(2</b> L)	311
17		8. Discrepancy	, '6	( " "		<u>~</u>			r1		, <u></u>	<u></u>	
	I ⊩	8a. Discrepancy Indication	on Space Quantity		Туре		Residue		Partial F	Rejection		L Fulf	Rejection
							14	Ni. wie					
			Casasatari				Manifest Refer	ence Number:	U.S. EPA II	D Number			
Ē	[]	8b. Alternate Facility (or (	senerator)										
Š	DESIGNALED PACILITY	<b>H441</b>											
į	ΞĦ	acility's Phone: 8c. Signature of Alternati	e Facility (or Generator)	<u> </u>								Month I	Day Yea
	₹				,								
1	핡	9. Hazardous Waste Rej	port Management Method Cod	les (i.e., codes for hazar	dous waste treatment, dis	posal, and r	ecycling syster	ns)	4.				
		11111	2.			3.	•		7.				
1	ì	1111			- stadele course d'hu iba	manifest ev	ent as noted in	n Item 18a				····	<del></del>
-			wner or Operator: Certification	of receipt of hazardous	materials covered by the	manitest ex Signature	Joyl as HUISU II	n nont tua	1			Month	Day Yea
	$\  \ '$	Printed/Typed Name	STORM	12010		1	M	um	11/1-			10	21/
Ĺ	<b>↓</b>	Farm 0700 20 (Page 2	-05) Previous editions are	obsolete.	<u> </u>		D.	ESIGNATE	FACILITY T	O DEST	INATION	STATE (	F REQUIRE
£	:PA l		-00) Flevious editions are		_ ,				=			,	
		Choules			D-1	$\supset$							
		**************************************		-									

•			
			1.0

Ples		it or type. (Form designed	for use on elite (12-nitch	) typewriter \	· Atama		19 19 19 A	44 .	Forr	n Approved OM	B No. 2050-0039
1	UNIF	ORM HAZARDOUS 1.G	enerator ID Number	J typewinterly - rearrant, survive and		nergency Response		4. Manifest	Tracking N	umber	. 7
	WA	STE MANIFEST	hosansa	2 G C		(10) A (1)				<u> 19831</u>	FLE
	24.00	erator's Name and Mailing Ad			Gene	rator's Site Address	(if different tn	an mailing addres	ss)	*	
		Mis Market Street			* >	(1999) Market	1. 医复数电路电池电			*	
	Gener	ator's Phone:	TENERAL SERVICE	All the Alice of Communications		orka Milija				1	
	6. Trar	sporter 1 Company Name	S 2.97-255 CS C = 400	Committee of the Commit				U.S. EPA ID N	Number		
	*}\e	turi karibaran Karalan	aatorestal Vorvêge	V šiet						172234	γ
	l	sporter 2 Company Name						U.S. EPA ID N	lumber		
	음 Des	ignated Facility Name and Site	e Address	· · · · · · · · · · · · · · · · · · ·				U.S. EPAID N	jy 3 ily	<u> </u>	3
	l	ing Consultation									
	- 48°	73 Sarius Grave A Canada OH 1973.	V4411752		GMD:	090	3 4 5 5 2 5	P			
	Facility	's Phone:							·		
	9a. HM	9b. U.S. DOT Description (in and Packing Group (if any))	cluding Proper Shipping Na	ne, Hazard Class, ID Number,	غذ	10. Contai No.	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13. Wast	e Codes
8		<sup>1</sup> 941763 Waste	自然的 经间面证券	MATERIAL 3:140	1.00	9				0061 ba	35 Vios
GENERATOR	Ä.					Lugan	Don	4200			
NEF		2.				g grindyster to a	Carlot Service	9 98 558	<u> </u>	(94)9%	
8											
		_									
		3.									
		4.							<u> </u>		
											one succession of the second
	14 Sn	ecial Handling Instructions and	Additional Information					L		1 435 4 4 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	
	l	4:235257	1184	de la companya della companya della companya de la companya della						A AMA	3.00
H				the Marie							
	п	ENERATOR'S/OFFEROR'S ( narked and labeled/placarded,	and are in all respects in pre	oper condition for transport acc	cording to applicable i	nternational and nat					
	E	xporter, I certify that the conte certify that the waste minimiza	nts of this consignment cont tion statement identified in 4	orm to the terms of the attache 0 CFR 262.27(a) (if I am a lare	ed EPA Acknowledgm oe quantity generator	ent of Consent. or (b) (if I am a sm:	all quantity ge	nerator) is true.		p. 1.	
	Genera	ator's/Offeror's Printed/Typed N	Vame		Signature					Month	Day Year
↓			COTT		en en en en en en en en en en en en en e			The Mark Harris .	tin en en en en	1	1 4 4
NT.F	ł	ernational Shipments	Import to U.S.		Export from U.S.	Port of er		<u> </u>			
		oorter signature (for exports or nsporter Acknowledgment of R				Date leav	ing U.S.:		years Vears		
TR ANSPORTER		orter 1 Printed/Typed Name	a constant and a cons		Signature	<i>f T</i>	and the	£ - \\	A MATERIAL PARTIES	Month	Day Year
SPO	Rite	Bernamen (To papite) (the					1.20Q		2.44		
AN AN	Transp	orter 2 Printed/Typed Name			∕Signature ∎		,-		a jär	Month	Day Year
兰	18 Die	crepancy							n it miggar Negresorie		
$\prod$	<del></del>	iscrepancy Indication Space				<u> </u>		<u> </u>	mesang ni merembag		
		,	Quantity	Туре		Residue		Partial Rej	ection :		ull Rejection
L						Manifest Reference	e Number:				W
Ē		ternate Facility (or Generator)						U.S. EPA ID N	Number		
FAC	1	's Phone;						1			•
SIGNATED FACILITY		gnature of Alternate Facility (o	r Generator)							Month	Day Year
N.S											
١≍	19. Ha	zardous Waste Report Manage	ement Method Codes (i.e., o	odes for hazardous waste trea	atment, disposal, and	recycling systems)		. 4.		<u> </u>	
	l <sup>''</sup>	4111	, 2.		3.			<b>4.</b>			
	20. De	signated Facility Owner or Ope	erator: Certification of receip	t of hazardous materials cover	red by the manifest ex	cept as noted in Iter	m 18a				
	Printed	/Typed Name			Signature		' " ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '			Month	Day Year
₩					1			45 13 13 145		\$165 1	



# Land Disposal Restriction Notification Form

Page: 1 of 1

Printed Date: Oct 12, 2011 MANIFEST INFORMATION Generator: Roush Manufacturing 12068 Market Street Address: 003909831FLE Livonia,MI 48150 EPA ID #: MID094555299 Sales Order No: D53840942 LINE ITEM INFORMATION Line Item: Page No: Profile No: Treatability Group: LDR Disposal Category CH235257 NON-WASTEWATER 2 (This is subject to LDR.) **EPA Waste Code** EPA Waste SubCategory D001 High TOC Ignitable Liquids D035F003F005 LDR Chemical Data Underlying Constituents Contaminants Hazardous of Subject to Chemical Constituents Concern Treatment ETHYL BENZENE METHANOL Ν Y N METHYL ETHYL KETONE Ν Υ Ν **TOLUENE** Y Ν XYLENES (MIXED ISOMERS) Ν Certification Applies to Manifest Line <u>Items</u> Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268. Waste analysis data, where available is attached. Signature: Print Name Title:

SRB reid 8/29/12

ease print or type. (Form designed for use on elite (12-pitch) typewriter.)					Approved. OMB N	No. 2050-003
WASTE MANIFEST № 10094555299 1/4074	Emergency Response	1000	1 11,111 (11,11	1110 0,100,01011	umber 5359	FLE
rouse seminacture 11916 Warket Street 13vons NM 48150 Generator's Phone:	nerator's Site Address 2068 Mark et ivorsia III 45 i	Sircel				
6.Transporter 1.Company Name Clean Harbors Environmental Services Inc			U.S. EPA ID N		322250	
7. Transporter 2 Company Name Clean Harbors Erresconsners al Services inc			U.S. EPAID N		322250	
8. Designated Facility Name and Site Address  Strong Cardy Prescribed Recovery trac  43.70 Serving Cardy Avenue  Cardy att. ON 40232  43.51 SEL-5733			U.S. EPAID N	erana ng Pinta.	316629	
Facility's Phone:  9a. 9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number,	10. Conta	Iners	11, Total	12. Unit		
HM and Packing Group (if any))	No.	Туре	Quantity	Wt./Vol.	13. Waste (	
20H1263, WASIE PAINT MELATED MATERIAL, 3, PO II	14	m	4000	P	- G ( ) = 2	
20N1263, WASTE PAINT RELATED MATERIAL, 3, PG (I		Dm	300	general grant of the second	0035 -003	003
14. Special Handling Instructions and Additional Information   1 CHESSES 7 ERGELES / 2 CHESSES 7 ERGELES / 2 STATE   15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are						
marked and labeled/placarded, and are in all respects in proper condition for transport according to applicat Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowled I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity genera	gment of Consent. tor) or (b) (if I am a sm	nall quantity ge		. II expon s		
Generator's/Offeror's Printed/Typed Name Signa	ure //-E	ext			Month	Day Year
In the material Supplements   Import to U.S.   Export from U.S.   Export from U.S.   Import to U.S.   Import to U.S.   Export from U.S.   Import to U.S.   Export from U.S.   Export f	Port of e	ntry/exit:				
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Sieguhier Garthuk Transporter 2 Printed/Typed Name Signa	W. W. W. W. W. W. W. W. W. W. W. W. W. W	1 4	i Wild		Month  Month  Month	Day Year
¥	LAND T	yar Lili			E2    F	3 12
18a. Discrepancy Indication Space Quantity Type	Residue  Manifest Reference	ea Numbar	Partial Re	jection	Ful	ll Rejection
18b. Alternate Facility (or Generator)  Facility's Phone: 18c. Signature of Alternate Facility (or Generator)  19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, a	Trea most field it	- Computer	U.S. EPAID	Number		
18c. Signature of Alternate Facility (or Generator)					Month	Day Yea
19, Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, a 1. HOSI 2. HOSI 3.	nd recycling systems)		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifes	t except as noted in Ite	em 18a				
Printed/Typed Name Signa	ture				Month	Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

·	·	•
		٠, .
	· ·	
	*	

	int or type. (Form designed for use on elite (12-pitch) typewriter.)  FORM HAZARDOUS WASTE MANIFEST: 21. Generator ID Number	22. Page	23. Mani	fest Tracking Nun	nber		OMB No. 2	2050-0
26.0	(Continuation Sheet) MID 04/355 255	1 2562	00	45310	SIM	FIU		
24. (	Senerator's Name Procest Muchachicus							
25.	Transporter Company Name		1 to 1 to 1 to 1 to 1 to 1 to 1 to 1 to	U.S. EPA ID N				1.4.5
	Clean harbors tharbhmental befores ind			U.S. EPA ID N	393 Jumber	77396	0	1,734, 345,44
A ST	Transporter 4 Company Name Triad Transport		en en en en en en en en en en en en en e	JOK I	<u> </u>	5/5€	1879	7/
27a HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, -and Packing Group (if any))	28, Contair No.	rers Type	29. Total Quantity	30, Unit Wt./Vol,	- 31, \	Waste Codes	
						***************************************		***********
9 + 1 9 + 1					h 1			
								4
32. S	pecial Handling Instructions and Additional Information					Verification		
33. T	ransporfer Acknowledgment of Receipt of Materials ed/Typed Name Signature		<i>i</i>		ande, dê	Mo	nth Day	
	Printheyou Desiry Chit 1 C	Muk	/ the you			11.74	2, 7	um anna
	ransporter         Acknowledgment of Receipt of Materials           ed/Typed Name         Signature           EUC(5         The control of the c	J	<u>L</u> en	No antimote of the computer of the	50 	Mo	nth Day	13 1
35. E	iscrepancy	Adress	Service Participation		entrone and and and		de Com	<u> </u>
36. F	lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and re	ecyclina systems)						
	gorina against mained seeds (cs., seeds (c) hazartood richte socialisti, disposal, alu te							

	•	•		
			-	

Ple	ase p	rint or type. (Form desig			riter.)								d. OMB No.	2050-003
1	۱	NASTE MANIFEST		lumber 455599	¥	2. Page 1 of		rgency Respons		4. Manifest	Tracking N	lumber 000	9	LE
	5. G	enerator's Name and Maili	ng Address			,	Generat	or's Site Addres	s (if different th	nan mailing addres	ss)			nous man
n N	1. ¥	1518 Market Strands & 1516 CYTEVI Derator's Phone:	)	<b>声</b> 掌军整门规则是	* A CARLERAN			99 Marks 1601, 1667 4 15						
	6. Tr	ransporter 1 Company Nar	ne Vistopris todas (i	# Services in				***************************************		U.S. EPA ID N		9372	100	
		ransporter 2 Company Nar देव अस्त्र केंद्री सर्वेक्ट्रोकड हैं के		素 Santa 对别如果 养细的						U.S. EPA ID N		A 2 21 2	50	
	4	esignated Facility Name a	经 馬里斯科斯	र्षक्रम् १ के हे बर्	······					U.S. EPAID N		3 : 5 9	2 %	**
	1			T PN										et, Life
	9a. HM	9b. U.S. DOT Descript and Packing Group (if	ion (including Prop any))	er Shipping Name, Haza	ard Class, ID Number	r,		10. Conta No.	ainers Type	11. Total Quantity	12. Unit Wt./Vol.	13	. Waste Code	es
ror	V.	1. **** * * * * * * * * * * * * * * * *	कर <b>छ</b> , व <i>जार्गा</i> डड	কিছিলিটিনটো গ্রেছ সভারতে <sup>†</sup>	a, vika Baji <mark>sali interior</mark> a	e 9th		ž t š	TA . 6 . 14	, ,	and the state of t	30848.	20750	F 100 F 1
GENERATOR	_	2 建煤 三元 / 梁点	SAE SPEAKE	veraneo mat		1 3 4		17		<u> </u>	į	EDECTO SEASON		13835
35  -	€							to Maria		300				
		3,										Control of the Contro		**************************************
	<u> </u>	4.	-										<u> </u>	
			1191											
	15.	GENERATOR'S/OFFERC marked and labeled/placa Exporter, I certify that the I certify that the waste mir	OR'S CERTIFICATION of this contents of this content of	respects in proper cond signment conform to the	dition for transport ac e terms of the attach	cording to appli- red EPA Acknow	cable inter /ledoment	national and na of Consent.	itional governm	ental regulations.	pping name If export sh	e, and are cla ipment and I	assified, pack am the Prim	aged, ary
	Gene	erator's/Offeror's Printed/Ty	ped Name				nature	<u> </u>		ioratory is add.			inth Day	994.45
Ĭ	16. Ir	nternational Shipments		to U.S.		Export from	U.S.	Port of e	ntry/exit:				* EV	
품		sporter signature (for expo ransporter Acknowledgmer		erials				Date leav	ving U.S.;				*	
TR ANSPORTER INT'L		sporter 1 Printed/Typed Na	me			Sig	nature //		1 4			Mo:   ₹3:		Year
RANS	Trans	sporter 2 Printed/Typed Na	me			Sig	nature		-22	**************************************		Mo	nth Day	Year
<u>⊢</u>	18. D	Discrepancy												
	18a, I	Discrepancy Indication Spi	ace Qua	ntity	Туре			Residue		Partial Reje	ection		Full Rej	ection
-	18b. /	Alternate Facility (or Gener	ator)				Ma	nifest Referenc	e Number:	U.S. EPA ID N	umber			
FACI		ity's Phone:												
SIGNATED FACILITY	18c. S	Signature of Alternate Faci	ity (or Generator)									Mc 	onth Day	Year
		lazardous Waste Report M	anagement Method	Codes (i.e., codes for I	hazardous waste trea	atment, disposa	I, and recy	rcling systems)						
		\$94£		2.		3.		· · · · · · · · · · · · · · · · · · ·		4.				
		esignated Facility Owner o	r Operator: Certific	ation of receipt of hazar	dous materials cover	red by the manif	fest excep	as noted in Ite	m 18a	L				
		ed/Typed Name					nature		· · · · · ·			. Mo	nth Day	Year
¥										ä		1		



# Land Disposal Restriction Notification Form

Page: 1 of 2

Printed Date: Mar 20, 2012

MANIFEST INF	ORMATION							
Generato	r: Roush Manuf	acturing			Manifest Tracking	Info.		
Addres	ss: 12068 Market Livonia,MI 48			004826869FLE				
EPA ID		55299		Sales Order No: D54201762				
LINE ITEM INF								
	Page No:	Profile No:	Treatability Group					
1.	1	CH235257	NON-WASTEWA	TER	2 (This is subject to LD	PR.) 		
EPA Waste Co	de			~~ ~~~~~~~~~	ste SubCategory			
D001				High TOC	Ignitable Liquids			
D035F003F005				NONE				
			LDR Chemical D	ata	(fig. 1961 and last free that the left that then the view 1964 are the are seen over over over over over over over over			
Chemical	Constituents of Concern	Contaminants Subject to Treatment						
ETHYL BENZE	NE			N	Υ	N		
METHANOL				Ν	Y	N		
METHYL ETHY	'L KETONE			N	Υ	N		
TOLUENE				N	Υ	N		
XYLENES (MIX	(ED ISOMERS)			N	Υ	Ņ		
LINE ITEM INF								
Line Item:	Page No:	Profile No:	Treatability Grou	D:	LDR Disposal Categor	у		
2.	1	CH235256	NON-WASTEWA	TER	2 (This is subject to LE	PR.)		
EPA Waste Co	de			EPA Wa	ste SubCategory			
D035F003F005				NONE				
			LDR Chemical D	ata		· · ·		
				Underlying	Constituents	Contaminants		
				Hazardous	of	Subject to		
Chemical				Constituents	. The first last design case and design case with this date of the child of the child of the child of the child	Treatment		
ETHYL BENZE	NE			Υ	Υ	N		
METHANOL				Υ	N	N		
TOLUENE				N	Y	N		
XYLENES (MIX	(ED ISOMERS)			N	YY	N		

-			•	
	•			
	•			



# Land Disposal Restriction Notification Form

Page: 2 of 2

Printed Date :Mar 20, 2012

	Applies to Manifest Line Items			
Pursuant to 40 CF Part 268.	R 268.7(a), I hereby notify that this ship	oment contains was	te restricted under 40 CFR	1. 2.
Waste analysis da Signature : Title :	Sh.ppig hi-lo	Print Name Date:	Nick Mesi \ 3-20-12	

Mark Gomez	Jim Wenzel	Nick Mesi	Matt Scott	Pat Henterly	Jan Shupp	Rick VanHoesen	Carl Lalama	John Hobson			
	CORM	MCRM	MCRM	PNTM	PRTC	PRTC	PRTC	PNTC	Job Code		
									Required	WI-B28P-071 Loading	
				C	С				Assessment	Purge Solvent	
				×	×	×	×	×	Required	WI-B28P-062 Paint Daily	
				C	C	C	C	C	Assessment	Shut Down	
				×	×	×	×	×	Required	WI-B28P-064 Adpro Filter	
				C	C	O	C	O	Assessment	Change	
				×	×	×	×	×	Required	WI-B28P-065 Coupler and	
		П		C	C	C	C	n	Assessment	Shaft Inspection	
				×	×	×	×	×	Required	WI-B28P-066 Drum Roller	
				C	0	C	C	n	Assessment	Operation	
				×	×	×	×	×	Required	WI-B28P-073 Paint	
				C	C	C	C	C	Assessment	Kitchen Maintenance - Basecoat	
×	×			×	×	×	×	×	Required	WI-B28P-077 Paint	
C	C			0	C	C	C	C	Assessment	Storage	
×	×	×	×	×	×	×	×	×	Required	WI-B28P-076 Waste - 📝	
C	C	C	C	C	C	O	C	C	Assessment	Maintenance/Handling 🦶	
				×	×	×	×	×	Required	WI-B28P-075 Paint	
				C	C	C	C	C	Assessment	Cabinet Maintenance - Basecoat	
									Required		
									Assessment	1	
									Required		
									Assessment		
									Required		
									Assessment	1 — —	
									Required		
									Assessment		
									Required		
									Assessment	]	
									Required		
									Assessment		
									Required		
									Assessment	]	
									Required		
									Assessment		
									Required		
									Assessment		
									Required		
									Assessment		
									Required		
		1							Assessment	1	

Key:									
C = COMPETENT	NT = NOT YET TRAINED	N = NEEDS IMPROVEME	X = REQUIRED						

Mark Gomez	Jim Wenzel	Nick Mesi	Matt Scott	Pat Henterly	Jan Shupp	Rick VanHoesen	Carl Lalama	John Hobson		
	CORM	MCRM	MCRM	PNTM	PRTC	PRTC	PRTC	PNTC	Job Code	
				×	×				Required	WI-B28-003 Wash System
				C	C				Assessment	Filter Change
				×	×	×	×	×	Required	WI-B28P-016 Paint Ktche
				0	С	C	С	C	Assessment	Daily Log Sheets
				×	×	×	×	×	Required	WI-B28P-020 First Piece
				0	C	C	C	C	Assessment	Process
				×	×	×	×	×	Required	WI-B28P-024 Paint
				C	C	C	C	C	Assessment	Kitchen Viscosity Check
				×	×	×	×	×	Required	WI-B28P-025 Paint
				C	O	C	C	C	Assessment	Kitchen Daily Log Sheets
				×	×	×	×	×	Required	WI-B28P-026 Paint
				C	O	C	C	C	Assessment	System Start-Up
				×	×	×	×	×	Required	WI-B28P-027 Paint
				C	C	C	C	0	Assessment	Kitchen Adpro Start-Up
_				×	×	×	×	×	Required	WI-B28P-028 Paint
				C	С	С	C	0	Assessment	Kitchen Basecoat Start-U
				×	×	×	×	×	Required	WI-B28P-030 Part
-		-		0	C	C	0	0	Assessment	Verification Adpro Booth
				×	×	×	×	×	Required	WI-B28P-033 Paint
				0	0	0	C	0	Assessment	Kitchen Filter Change
				×	×	×	×	×	Required	WI-B28P-045 Paint
				C	0	C	C	C	Assessment	Kitchen Clearcoat Start-U
				×	×	×	×	×	Required	WI-B28P-046 Basecoat
	1			C	С	C	0	0	Assessment	Valve Assignment
				×	×	×	×	×	Required	WILBORD 047 Studenbog
				0	C	C	C	0	Assessment	WI-B28P-047 Sludgebag Change-Out
				×	×	×	×	×	Required	WI-B28P-048 Paint
				0	0	0	0	0	Assessment	Kitchen Activator Start-Up
				×	×	×	×	×	Required	WI-B28P-049 Bake Oven
				0	0	0	C	C	Assessment	Temperature Change
				×	×	×	×	×	Required	WI-BP-028 System Night
	T	$\vdash$		C	0	0	C	C	Assessment	Shutdown
×	×			×	×	×	×	×	Required	WI-B28P-032 Hazardous
0	0			C	C	C	C	C	Assessment	Waste Containment
	<del>                                     </del>			×	×	×	×	×	Required	WI - B28P-051 Tack-off
	$\vdash$		+	0	0	C	0	0	Assessment	booth - all parts
				×	×	×	×	×	Required	WI - B28P-056 Clearcoat
				0	0	0	0	C	Assessment	Viscosity Checks
			<del>                                     </del>	×	×	×	×	×	Required	WI -B28P- 058 Paint -
_	+		1	0	0	0	C	0	Assessment	Fluid Temperature

·	-		
			•
		•	

ROUSH Mark Gomez

# JOB DESCRIPTION

Job Title:

Environmental, Health and Safety Coordinator

## Job Summary:

Responsible for implementing and maintaining a safety and health program for the Company. The Environmental, Health & Safety Coordinator will also ensure and maintain compliance with Environmental, MIOSHA, DEQ and OSHA Standards and Regulations.

### Reporting Responsibilities:

Reports to the Special Projects Manager.

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

### Knowledge, Skills, and Abilities:

- □ Bachelor's degree (B.A.) from four-year college or university; in a job-related field or equivalent.
- □ Five years experience related to defined job responsibilities or equivalent training.
- While performing the duties of this job, the employee is regularly required to sit, walk; and talk or hear. The employee must occasionally lift and/or move up to 10 pounds and may be subjected to loud noise levels created by power tools, production machinery and heavy traffic. The employee may also be required to work near moving mechanical equipment.
- Competence in use of Microsoft Office applications for Excel, Word, Projects.
- Strong organizational skills.
- Self Starter
- Availability to work overtime frequently, including weekends and travel is possible.
- ☐ High communication, interpersonal and organizational skills
- Ability to work on a flexible schedule when follow-up or training is require on off shifts.
- Ability to handle or work near industrial chemicals or vapors such as solvents, cleaning agents and flammable liquids.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

**Essential Duties and Responsibilities** include the following. Other duties may be assigned.

- Manage reports, etc. with government regarding paint usage and disposal of hazardous materials
- Assess and investigate environmental working conditions in relation to safety and health compliance.
- □ Create, write, and develop necessary safety training materials, documents and procedures for an effective safety program.
- Coordination of EPA/DEQ and ISO 14001 compliance, response, training, reporting, record keeping and auditing
- □ Conduct quarterly safety and health inspection surveys and take appropriate corrective action in compliance with MIOSHA/OSHA regulations.
- □ Enforce MIOSHA/OSHA standards and regulations for the safety of the employees and customers while on company property.
- ☐ Training of Corporate Environmental, Safety and Evacuation.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

8/31/2012 SRB

D-27

### Job Title:

Material Control Supervisor - RMT

# Job Summary:

Responsible for coordinating the orderly and timely flow of all materials to support production.

## **Reporting Responsibilities:**

Position reports to the Director of Operations.

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and /or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

# Knowledge, Skills, and Abilities:

	Associate's degree or equivalent from a two-year college or technical school; or two to four years related experience and/or training or equivalent	
	combination of education and experience.  Familiarity with products and services, along with methods and procedures	
_	used to produce these products provided by Roush, preferred.	
	Ability to read, analyze and interpret general business periodicals,	
	<u>professional journals</u> , technical procedures or governmental regulations, when <u>applicable</u> .	SRB
	Ability to write reports, business correspondence and procedure manuals.	
	Ability to effectively present information and respond to questions from	
	groups of managers, clients and employees.	
	Ability to calculate figures and amounts such as discounts, interest,	
	commissions, proportions, percentages, area, circumference, and volume.	
	Ability to apply concepts of basic algebra and geometry.	
Ц	Ability to define problems, collect data, establish facts and draw valid	
	conclusions. Ability to interpret an extensive variety of technical instructions	
	in mathematical or diagram form and deal with several abstract and concrete variables.	
П	Competence in the use of Microsoft Office applications for word processing	
_	and spreadsheets.	
	and spreadsheets.	
Essential lassigned.	Duties and Responsibilities include the following. Other duties may be	
	Coordinate the delivery of all materials and equipment of purchased and consigned materials within the assigned area of the company.	
Approved by:	Stan Kennard Revision Date: 03/02/10	

Origination Date: 05/27/98 Form Number:

W-CP004

•	
	ı

Responsible for notifying purchasing/suppliers of non-conforming material
and assists in requesting return shipments and RTVs.
Provide management reports, as requested.
Maintain accurate inventory levels of computerized and non-computerized
inventory.
Maintain and administer all Physical and Cycle counting aspects.
Recommends measures to improve material control procedures.
Responds to needs of customers, both internal and external.
Suggest changes in working conditions and use of equipment to increase
efficiency of the department.
Analyzes and resolves work problems, or assists employees in solving work
problems.
Performs activities of material control personnel, when required.
Interprets company policies to employees and enforces safety rules. skb
Monitors work in progress and finished products.
Ensure compliance to Quality System procedures and work instructions.
Responsible for personnel reporting to him/her including Performance
Reviews.
Maintains time and attendance records.
Performs other related duties as assigned by management.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

•		•	•		•
				•	
	•				
				4	
		•			

## JOB DESCRIPTION

PRIC PNTC

#### Job Title:

Robotic Technician

## Job Summary:

The Robotic Technician is responsible for maintaining all robotic equipment within the plant to ensure uninterrupted service in those areas where they are used.

## **Reporting Responsibilities:**

Position reports to, or is assigned by, the Paint Department Supervisor

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and /or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

## Knowledge, Skills, and Abilities:

	High School diploma or general education degree (GED); or one to three years related experience and/or training; or equivalent combination of education and experience.
	Must be knowledgeable of painting or sanding operations of automotive body components
Essential assigned.	Duties and Responsibilities include the following. Other duties may be
	Develops and maintains set-ups for all parts that will be robotically sanded or painted
	Confers with engineering when developing fixtures for new programs
	Maintains all robotic equipment and end-of-arm tooling, performs required
	preventive maintenance, and updates records when necessary
	Maintains acceptable inventory level of spare parts to support repairs or replacement
	- supports the maintenance personnel when necessary
	Troubleshoots robotic failures or inconsistencies by evaluating programming,
_	schematic diagrams or blueprints
	Assists in the changing of any filters, nozzles and tips, or other duties as assigned by
_	the supervisor
	Coordinates efforts with others to ensure optimum efficiencies of robots
	Maintains housekeeping within the robotic area – cleans parts, tools, and fixtures
_	1 0
	with rags or solvents
	Utilizes proper methods for disposal of scrap and cleaning materials
	Assists in the training of other employees to develop them as a back-up in this
	position

•	·		•	•
				•
•				
				•
				·
•				
		·		

## **Work Environment**

Predominately in a factory setting
Involves operating or working near moving mechanical equipment
May work in environments that are hazardous and require personal protection
equipment
May be exposed to extreme temperatures
Must be able to lift and move containers of up to 50 lbs.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

	•		•	•
				÷
		•		

# **ROUSH**

PNTM

#### JOB DESCRIPTION

#### Job Title:

Production Paint Booth Supervisor

## Job Summary:

Supervise employees and maintain workflow within the paint booth area. Inspect parts to ensure the parts conform to standards. Inspect and maintain the paint booth area. Order paint and booth materials as needed.

## **Reporting Responsibilities:**

Position reports to the Quality Manager.

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

## Knowledge, Skills, and Abilities:

- Professional knowledge of paint and paint applications.
- Professional knowledge of plastics.
- Professional knowledge of paint booth operations.
- Ability to communicate effectively verbally and in written form.
- Ability to lift 50+ lbs. frequently.
- Knowledge of basic mathematics, measurements and volumes.
- Ability to stand for long lengths of time.

### Essential Duties and Responsibilities included: (Others may be assigned)

- 1. Start up paint booth.
- 2. Start up Ad-Pro system.
- 3. Start up Base system.
- 4. Start up Clear system.

Originator: R. France Orig. Date: 01/22/04 Control # 2 Revision 1 Revision Date: 01/22/04 W-CP004

I
Job Description-PPPBSupervisor.doc

	•		•		
				•	
		•			

- 5. Start up Clear system 2.
- 6. Turn on paint ovens.
- 7. Mix paint.
- 8. Prep paint guns.
- 9. Advise paint team of current daily quota.
- 10. Paint parts. (See Production Paint Painter description.)
- 11. Check inventory and order materials if necessary.

The specific statements shown in each section of this description are general in nature are not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties. On the job training will be made available as needed to qualified persons.

•	•		•

PRTO

## JOB DESCRIPTION

Job Title:	
Pai	nt Room Technician
Job Sumn	nary:
the	e Paint Room Technician is responsible for coordinating all activities within paint room to ensure an uninterrupted flow of materials to support the paint oth operation.
Reporting	g Responsibilities:
Pos	sition reports to, or is assigned by, the Paint Department Supervisor
duty satisf skill, and i	n this job successfully, an individual must be able to perform each essential actorily. The requirements listed below are representative of the knowledge, for ability required. Reasonable accommodations may be made to enable s with disabilities to perform the essential functions.
Knowledg	ge, Skills, and Abilities:
	High School diploma or general education degree (GED); or one to three years related experience and/or training; or equivalent combination of education and experience.  Must be knowledgeable of Paint and paint applications  Must have experience working in paint mix rooms and with automated paint spraying
	systems  Knowledge of painting automotive exterior plastic body components
Essential assigned.	Duties and Responsibilities include the following. Other duties may be
	Maintains proper inventory levels of all paints, solvents, and supplies necessary to
	support daily painting operations  Completes all daily paint mixing, color matching, testing, and inspections as required by plant SOP's
	Conducts periodic mix / spray room audits  Maintains test equipment and arranges for calibrations when they are due

☐ Maintains housekeeping within the day room and spraying compartments

☐ Utilizes proper methods for disposal of scrap and paint materials

☐ Participates in paint defect identification and problem solving sessions

updates records when necessary

• Coordinates efforts with paint robotic technicians to ensure optimum efficiencies Arranges for the transfer of inventory from the outside storage facility to the day

☐ Maintains all painting equipment, performs required preventive maintenance, and

•		•	•
	·		

	Assists others within the paint booth in changing filters, nozzles and tips, kettle repair, and other duties as assigned by the supervisor Assist in the training of other employees in proper day room operations
Env	vironment
	Predominately in a factory setting
	Involves operating or working near moving mechanical equipment
	May work in environments that are hazardous and require personal protection equipment
	May be exposed to extreme temperatures
	Must be able to lift and move containers of up to 50 lbs.
	Env

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

8/31/2012 SRB

MCRM

# **ROUSH**

## JOB DESCRIPTION

Job Ti	tle:	
	Material Control Personnel	
Job Su	ımmary:	Comment [LS1]:
	Responsible for movement of purchased and consignment materials or equipment and general maintenance of the building assigned.	
Repor	ting Responsibilities:	
	Position reports to the <u>Material Control Leader</u> , <u>Material Control Supervisor or Purchasing/Material Control Supervisor</u> .	
duty so skill, a	form this job successfully, an individual must be able to perform each essential tisfactorily. The requirements listed below are representative of the knowledge, and /or ability required. Reasonable accommodations may be made to enable luals with disabilities to perform the essential functions.	
Know	ledge, Skills, and Abilities:	
	☐ High school diploma or general education degree (GED); or one to three months related experience and/or training; or equivalent combination of education and experience.	
	☐ Experience operating a Hi-Lo, preferred	
	☐ Ability to read and comprehend simple instructions, short correspondence, and memos. Ability to write simple correspondence. Ability to effectively	
	present information in one-on-one and small group situations to customers, clients, and other employees of the organization.  ☐ Ability to add and subtract two digit numbers and to multiply and divide with 10's and 100's. Ability to perform these operations using units of American	
	money and weight measurement, volume, and distance.  Ability to apply common sense understanding to carry out instructions furnished in written, oral, or diagram form. Ability to deal with problems	
	<ul> <li>involving several concrete variables in standardized situations.</li> <li>□ While performing the duties of this job, the employee is regularly required to lift and/or move up to 100 pounds.</li> </ul>	

6/22/98 Printed: 8/30/2012 4:05:00 PM W-CP004

jobdesc\matlcont.doc



•	•		•
		•	

Essential Duties and Responsibilities include the following. Other duties may be assigned.

Maintain material or equipment flow to and from shop floor or other location
as required.
Receive, check and stock all incoming materials and equipment.
Inventory materials and equipment as requested.
Ship materials and equipment as requested.
Responsible to support department Quality System and follow any procedures
or work instructions provided for assigned projects.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

6/22/98 Printed: 8/30/2012 4:05:00 PM W-CP004

jobdesc\matlcont.doc